TSD File Inventory Index

Date: January 16, 2001

Initial: C McKenna

Facility Name: Boise Cascade Corporation (Insulite Division - Ontario Site)			
Facility Identification Number: MND 980 700 884			
A.1 General Correspondence	✓	**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	✓	.1 Correspondence	
.1 Correspondence	✓	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	✓	**C.1 Compliance - (Inspection Reports)**	✓
.3 Part A Application and Amendments	✓	**C.2 Compliance/Enforcement**	✓
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports	✓	**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	✓
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	✓	.3 State Prelim. Investigation Memos	
.1 Correspondence	✓	.4 RFA Reports	✓
.2 Closure/Post Closure Plans, Certificates, etc	✓	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total – 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments: Documents do not go by individual folder per schedule.

Public Participation

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

NAME OF LIBRARY CONTACT, LIBRARY AND LOCATION:
ATTN: Ms. Menefee
InternationalFalls Public Library
3rd St. and 8th Ave.
International Falls, MN 56649

FACILITY NAME, LOCATION AND ID #:
Boise Cascade Hardboard Products Division
2nd St. ID# MND980700884
International Falls, MN 56649

MATERIALS RECEIVED:
CLOSURE PLAN

Public notice

DATE RECEIVED/MADE AVAILABLE TO PUBLIC: 6-13-84

SIGNATURE OF RECEIVING PARTY: W Menefee

PLEASE RETURN (IN SELF-ADDRESSED, POSTAGE AND FEES PAID, ENVELOPE) TO:

U.S. Environmental Protection Agency
5HW-13
230 S. Dearborn Street
Chicago, IL 60604

Attention: Christine Klemme

Christine Klemme (312) 886-3715

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE: U.S. Environmental Protection Agency, Waste Management Branch	For Agency Use Only
PLACE VOUCHER PREPARED: 230 S. Dearborn, Chicago, IL 60604 — DATE PREPARED: 5/4/84	VOUCHER NUMBER
NAME OF PUBLICATION: Internationa l Falls DAILY JOURNAL	SCHEDULE NUMBER
NAME OF PUBLISHER OR REPRESENTATIVE: Arlin Albrecht, Publisher	PAID BY
ADDRESS (Street, room number, city, State, and ZIP code): P.O. Box 951, International Falls, MN 56649, (218) 285-7411 — ATTN: Display Advertising, Ms. Marcia	

RECEIVED JUN 07 1984 WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR

CHARGES

TYPEFACE (size of type) POINT PER (inch, square, word, or folio)

Line Rates	NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
FIRST INSERTION		$	$
ADDITIONAL INSERTIONS GIVE NUMBER ▶			
TOTAL			$

Other Rates	TOTAL COST
FIRST INSERTION	
ADDITIONAL INSERTIONS GIVE NUMBER ▶	
TOTAL	

Attach one copy of advertisement (in... copy of voucher here. If copy is not ...

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA) has received notice of a closure from the Boise Cascade Corporation of International Falls, Minnesota, concerning its Hardboard Manufacturing Division facility located at 400 W. Second Street in International Falls, Minnesota. Boise Cascade stores spent xylene, dried paint, and clean up materials (i.e., polyethylene drop-cloths, absorbent materials, and rags) from its industrial printing of siding products. These spent solvents and materials are considered to be hazardous wastes under Federal regulations. The closing of this facility has been effected by the removal of all hazardous wastes for off-site disposal, and the flushing and venting of all tanks and containers, to comply with Title 40 CFR 265.111.

The closure plan was submitted to satisfy regulaitons promulgated under the Resource Conservation and Recovery Act, as amended. U.S. EPA required a closure plan when Boise Cascade notified the U.S. EPA of its intent to close their hazardous waste facility.

The closure plan and related background materials are available to the public at U.S. EPA, Waste Management Branch, 230 South Dearborn St., 13th Floor, Chicago, Illinois 60604, (312) 886-3715, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials also may be seen during business hours at the International Falls Library, Third Street and Eighth Avenue, Reference Desk, International Falls, Minnesota.

Public comments concerning the certification of this action are invited by U.S. EPA and will be accepted through July 16, 1984. Please send comments to:
U.S. Environmental Protection Agency
Region V-5HW-13
230 S. Dearborn Street
Chicago, Illinois 60604
ATTN: Christine Klemme

This represents a true billing for the ... completed.

SIGNATURE OF PUBLISHER OR REPRES...

TITLE

ADVERTISEMENT PUBLISHED IN	...TE PUBLISHED
I certify that the advertisement d... payment.	...is correct and eligible for
SIGNATURE AND TITLE OF CERTIFYIN...	...TE
SIGNATURE AND TITLE OF AUTHORIZ...	...TE
	...ID BY CHECK NUMBER

DISPLAY AD WITH AFFIDAVIT 6/5/84 6840200

$ 60.00

QTN183 4A4E05B002

RECEIVED JUN 07 1984 WASTE MANAGEMENT BRANCH

¹ If the ability to certify and authority to approve are combined in one person enter "N/A" (not applicable) here.

☆ GPO ...-153 (6100)

Christine Klemme (312) 886-3715

September 1973
Treasury FRM 2000 Standard Form No. 1143

ADVERTISING ORDER

50252NASA
ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE
U. Environmental Protection Agency, Waste Management Branch

DATE 5/4/84

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN
International Falls DAILY JOURNAL

SUBJECT OF ADVERTISEMENT	EDITION OF PAPER ADVERTISEMENT APPEARED
PUBLIC NOTICE	Evening
NUMBER OF TIMES ADVERTISEMENT APPEARED	**DATE(S) ADVERTISEMENT APPEARED**
ONE time	June 15, 1984

SPECIFICATIONS FOR ADVERTISEMENT

Legal Notice/Classified Ads with a display border

COPY FOR ADVERTISEMENT

See attached Sheet

AUTHORITY TO ADVERTISE	INSTRUMENT OF ASSIGNMENT
NUMBER 50252NASA	NUMBER
DATE June 6, 1984	DATE
SIGNATURE OF AUTHORIZING OFFICIAL Elma Apenzeller	TITLE

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC, D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 8:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ▶

U.S. Environmental Protection Agency
Financial Operations Section
230 S. Dearborn
Chicago, IL 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

83-107

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U. S. Environmental Protection Agency
Region V-5HW-13
230 S. Dearborn Street
Chicago, Illinois 60604
ATTN: Christine Klemme

A.2 Part A/
Interim Status

Minnesota Pollution Control Agency

March 31, 1998

Mr. James Jackson
Boise Cascade Corporation
780 Metro Parkway
Suite 300
Bloomington, Minnesota 55425

RE: Completion of Interim Status Corrective Action Requirements for Boise Cascade Insulite Division (MND 980 700 884)

Dear Mr. Jackson:

The Permit and Review Unit (PRU) of the Minnesota Pollution Control Agency's (MPCA) Hazardous Waste Division has reviewed your letters dated February 9, and 27, 1998. Both letters were written in response to questions raised by the PRU concerning investigation of an oil spill that occurred in 1979 (see previous letter dated October 24, 1997). The October 24, 1997, letter was written in response to a Preliminary Site Assessment/Visual Site Inspection (PA/VSI) of the property completed by a United States Environmental Protection Agency contractor in April of 1992.

Information collected during the PA/VSI indicated that additional information or investigation would be necessary in the vicinity of the 1979 oil spill area designated as Area of Concern 1 (AOC 1) in the PA/VSI. Your February 9, 1998, letter indicates that substantial changes have occurred in the vicinity of AOC 1. Evidently, expansion of the Boise Cascade Paper Division involved:

- Demolition of the main Insulite Division structures.
- Expansion of the Paper Division facilities in 1988.
- Completion of a Foundation Investigation Report that included several soil borings in the vicinity of AOC 1.
- Excavation (40' x 40' x 12-14') of the foundation of the above ground tank referred to in the PA/VSI as AOC 1.

- Excavation across the former location of AOC 1 for foundations and underground utilities varying in depth from 7 to 12 feet below the ground surface.

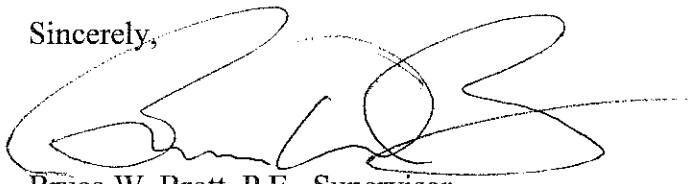
Although none of the work completed in the vicinity of AOC 1 was conducted to address environmental concerns related to the 1979 oil spill; Boise maintains that results from that work indicate that no further investigation or corrective action is necessary. Boise supports this position through soil boring logs and excavation locations and dimensions, as well as reports of petroleum contaminated soils being excavated and disposed of off-site.

Considering the information presented by Boise, the PRU agrees that no further investigation or corrective action is necessary concerning the 1979 oil spill referred to as AOC number 1 in the PA/VSI. Therefore, Boise has completed its corrective action requirements for interim status facilities under Section 3008 (h) of the Hazardous and Solid Waste Amendments to the Resource Conservation and Recovery Act.

However, if in the future information becomes available that indicates contamination is present from past waste management practices, Boise may be required to conduct additional investigations and cleanup work as deemed necessary by the MPCA.

The MPCA appreciates your cooperation and timely response in addressing such old and sometimes confusing material. Thank you.

Sincerely,



Bruce W. Brott, P.E., Supervisor
Permit and Review unit
Regulatory Compliance Section
Hazardous Waste Division

BWB:mk

cc: Harriet Croke, U.S. Environmental Protection Agency, Chicago
George Hamper, U.S. Environmental Protection Agency, Chicago

UNITED STATES
VIRONMENTAL PROTECTION AGENC
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

APR 26 1983

Mr. Allan W. Meadows, Pollution Abatement Specialist
Boise Cascade Corporation
Insulite Manufacturing
400 West 2nd Street
International Falls, Minnesota 56649

MND980700884

RE: Permit Application Withdrawal Letter
FACILITY NAME: Boise Cascade Corporation-Insulite Division
U.S. EPA ID NO.: MNT 280 010 695

Dear Mr. Meadows:

This is to acknowledge receipt of your letter of October 14, 1982, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 122.6 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly we will continue to process your application.

Please feel free to contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr.

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Dan B. Hogan, Vice President

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

file

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

DEC 9 1982

MEADOWS ALLEN POLLUTION SPEC
BOISE CASCADE CORPORATION INSULITE
400 W 2ND ST
INTL FALLS MN 56649
FACILITY: 400 W 2ND ST
LOCATION: INTL FALLS MN 56649
ID NO.: MNT280010695

Dear Applicant:

RE: U.S. EPA Identification Number Change

This is to inform you that the United States Environmental Protection Agency (U.S. EPA) will be changing your temporary (T) identification number to a permanent (D) one. The label below shows your current temporary number as "OLD T NO." and the new permanent number as "NEW D NO."

OLD I.D. NO.: MNT280010695

NEW I.D. NO.: MND980700884

In order to provide your facility with adequate time to convert to the permanent U.S. EPA identification number, we will make the change in our computer system effective January 1, 1983. This will allow you to use your temporary identification number until the end of the calendar year and, thus, cover all 1982 hazardous waste handled under one number for your annual report.

We have coordinated the identification number change with your State hazardous waste management office. The State has a listing of your old and new numbers.

Please contact Mr. Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions regarding this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Facility owner

FACILITY NAME

BOISE CASCADE CORPORATION INSULITE DIV

EPA ID NUMBER

MNT280010695

FACILITY OPERATOR

BOISE CASCADE CORP INSULITE DIV

FACILITY OWNER

BOISE CASCADE CORP INSULITE DIV

FACILITY LOCATION

400 W 2ND ST
INTL FALLS MN 56649

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S01	4730.00000	G

KEY

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G OR L
TANK	S02	G OR L
WASTE PILE	S03	Y OR C
SURFACE IMPOUNDMENT	S04	G OR L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, OR V
LANDFILL	D80	A OR F
LAND APPLICATION	D81	B OR Q
OCEAN DISPOSAL	D82	U OR V
SURFACE IMPOUNDMENT	D83	G OR L
TREATMENT:		
TANK	T01	U OR V
SURFACE IMPOUNDMENT	T02	U OR V
INCINERATOR	T03	D,W,E, OR H
OTHER	T04	J,R,N,S,U,V

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS\HOUR	W
GALLONS\HOUR	E
LITERS\HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS\HOUR	J
KILOGRAMS\HOUR	R
TONS PER DAY	N
METRIC TONS\DAY	S

FACILITY NAME
BOISE CASCADE CORPORATION INSULITE DIV

EPA ID NUMBER
MNT280010695

FACILITY OPERATOR
BOISE CASCADE CORP INSULITE DIV

FACILITY OWNER
BOISE CASCADE CORP INSULITE DIV

FACILITY LOCATION
400 W 2ND ST
INTL FALLS MN 56649

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S01	4730.00000	G

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DISPOSAL:		
INJECTION WELL	D79	G,L,U, OR V
LANDFILL	D80	A OR F
LAND APPLICATION	D81	B OR Q
OCEAN DISPOSAL	D82	U OR V
SURFACE IMPOUNDMENT	D83	G OR L
TREATMENT:		
TANK	T01	U OR V
SURFACE IMPOUNDMENT	T02	U OR V
INCINERATOR	T03	D,W,E, OR H
OTHER	T04	J,R,N,S,U,V

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS\HOUR	W
GALLONS\HOUR	E
LITERS\HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS\HOUR	J
KILOGRAMS\HOUR	R
TONS PER DAY	N
METRIC TONS\DAY	S

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ MNT280010695 REACKNOWLEDGEMENT

BOISE CASCADE CORPORATION INSULITE DIV
400 N 2ND ST
INTL FALLS MN 56649

INSTALLATION ADDRESS ➤

400 N 2ND ST
INTL FALLS MN 56649

EPA Form 8700-12B (4-80)

08/13/81

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
SA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO.	MNT2800 10685 ~~MND025505262~~
NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	BOISE CASCADE CORPORATION - Insulite Div. 400 W 2ND ST INTL FALLS, MN 56649
III. LOCATION OF INSTALLATION	400 W 2ND ST INTL FALLS, MN 56649

000021 JUL 18 80

DETACH

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER: MNT2800 10685 (T/A = 3, C = 1)

APPROVED: X

DATE RECEIVED (yr., mo., & day): 800718

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

CITY OR TOWN | ST. | ZIP CODE

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

CITY OR TOWN | ST. | ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: Meadows Allen Pollution Spec.

PHONE NO. *(area code & no.)*: 218-285-5351

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: Boise Cascade Corporation

DETACH

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: MND076505262

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

JUL 18 1980

CONTINUE ON REVERSE

FOR OFFICIAL USE ONLY

S												T/A	C
W	M	N	D	0	7	6	5	0	5	2	6	2	1
1	2										13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F017					
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Albert N Turenne	Albert N. Turenne Resident Manager	7/14/80

DETACH

DETACH

Timber and Wood Products Group

Boise Cascade

Insulite Manufacturing
International Falls, Minnesota 56649
(218) 285-5011

October 14, 1982

Environmental Protection Agency
Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

Re: Boise Cascade Corporation - Insulite Mfg. MNT280010695G, PA

Gentlemen:

Hazardous Waste Interim Permit Application for the above facility was submitted to your office in November, 1980. This filing was a protective measure due to ambiguities in the regulations. We were concerned at the time that in the future, additional wastes would be added to the waste lists that would then subject our facility to the regulations.

Clarifying amendments issued in the Federal Register (45FR76633) on November 19, 1980 clearly provide for timely application should our facility become subject to the regulations as a result of additions to the waste lists.

Based on our understanding of the aforementioned clarifying amendments, we are now confident that these permit applications were unnecessary. In order to reduce the burden on your agency as well as our staff, we are hereby requesting that the applications be withdrawn and the documents returned to this location.

Very truly yours,

BOISE CASCADE CORPORATION
Insulite Manufacturing

Allan W. Meadows

Allan W. Meadows
Pollution Abatement Specialist

AWM/bp

cc: B. King
G. Norstrom
R. Summer
P. Thomsen

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

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FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F M N 0 0 7 6 5 0 6 2 6 2 3 D

LABEL TYPE 5

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

MND980700884

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: B O I S E C A S C A D E C O R P . I N S U L I T E D I V I S I O N

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 M E A D O W S , A L L A N P O L L U T I O N S P E C .	2 1 8 | 2 8 5 | 5 3 5 1

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 4 0 1 W . 2 N D S T R E E T

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 I N T E R N A T I O N A L F A L L S	M N	5 6 6 4 9

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 4 0 1 W . 2 N D S T R E E T

B. COUNTY NAME

K O O C H I C H I N G

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 I N T E R N A T I O N A L F A L L S	M N	5 6 6 4 9	1 1 7

EPA Form 3510-1 (6-80)

NOV 19 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2499 (specify) standard hardpressed board	2499 (specify) insulation board
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: BOISE CASCADE CORP. INSULITE DIVISION

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; M = PUBLIC (other than federal or state); S = STATE; O = OTHER (specify); P = PRIVATE
P (specify)

D. PHONE (area code & no.): A 218 285 5536

E. STREET OR P.O. BOX: 400 W 2ND STREET

F. CITY OR TOWN: INTERNATIONAL FALLS

G. STATE: MN

H. ZIP CODE: 56649

IX. INDIAN LAND
Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
N MN0001643	9 P
B. UIC (Underground Injection of Fluids)	**E. OTHER (specify)**
U	9
C. RCRA (Hazardous Wastes)	**E. OTHER (specify)**
R	9

See attachment

(specify)

(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

the manufacture of insulation board sheathing and hardboard sidings products

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Dan B. Hogan Vice President	Dan B Hogan	11/19/80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(Fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA — EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F M N 0 0 7 6 5 0 6 2 6 2 3 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	1 4	0 7	1 1

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 3 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	55	G	
–	S 0 1	473	G	
3				
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

The best technical judgement available indicates that there are currently no other wastes generated by this facility that are deemed hazardous under 40 CFR Part 261. At such future date, that Part 261 is amended so that this facility becomes impacted by the regulations, a revised application will be submitted with appropriate process design capacity and process codes for the newly created hazardous waste activity.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completing [if you have] more than 26 wastes to list.

Form Approved OMB No. 158-S80004

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MNT 280010693

I. EPA I.D. NUMBER (enter from page 1): W M N 0 0 7 6 5 0 6 2 6 2 — T/A: 3 — C: 1

FOR OFFICIAL USE ONLY: W DUP — 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D008	4400	P	S01	
2	~~F017~~	~~*300~~	~~T~~	~~S01~~	
3					
4		* Industrial			
5		Paint Sludge			
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE

The best technical judgement available indicates that there are currently no other wastes generated by this facility that are deemed hazardous under 40 CFR Part 261. At such future date that Part 261 is amended so that this facility becomes impacted by the regulations, a revised application will be submitted with appropriate quantities and process codes for the newly created hazardous waste activity.

MNT 280010 6745

EPA I.D. NUMBER: F M N 0 0 7 6 5 0 6 2 6 2 3 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6:A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6:A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
48 36 30	093 24 20

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E NA	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Dan B. Hogan Vice President	Dan B. Hogan	11/19/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

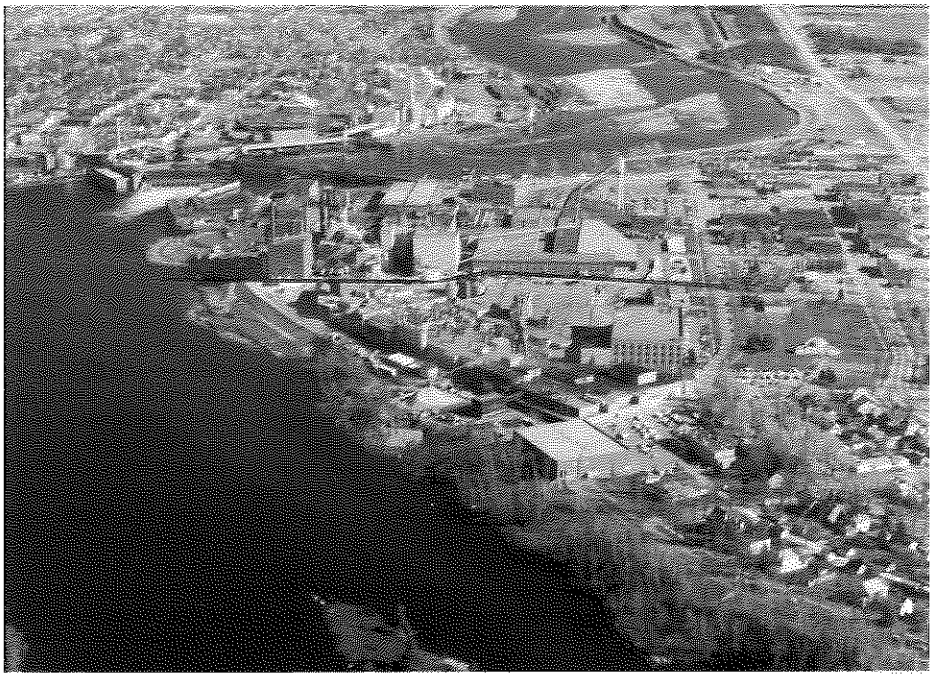
CONTINUE ON PAGE 5

Attachment For EPA Form 3 Item IV

Aerial Photo Insulite Siding Plant

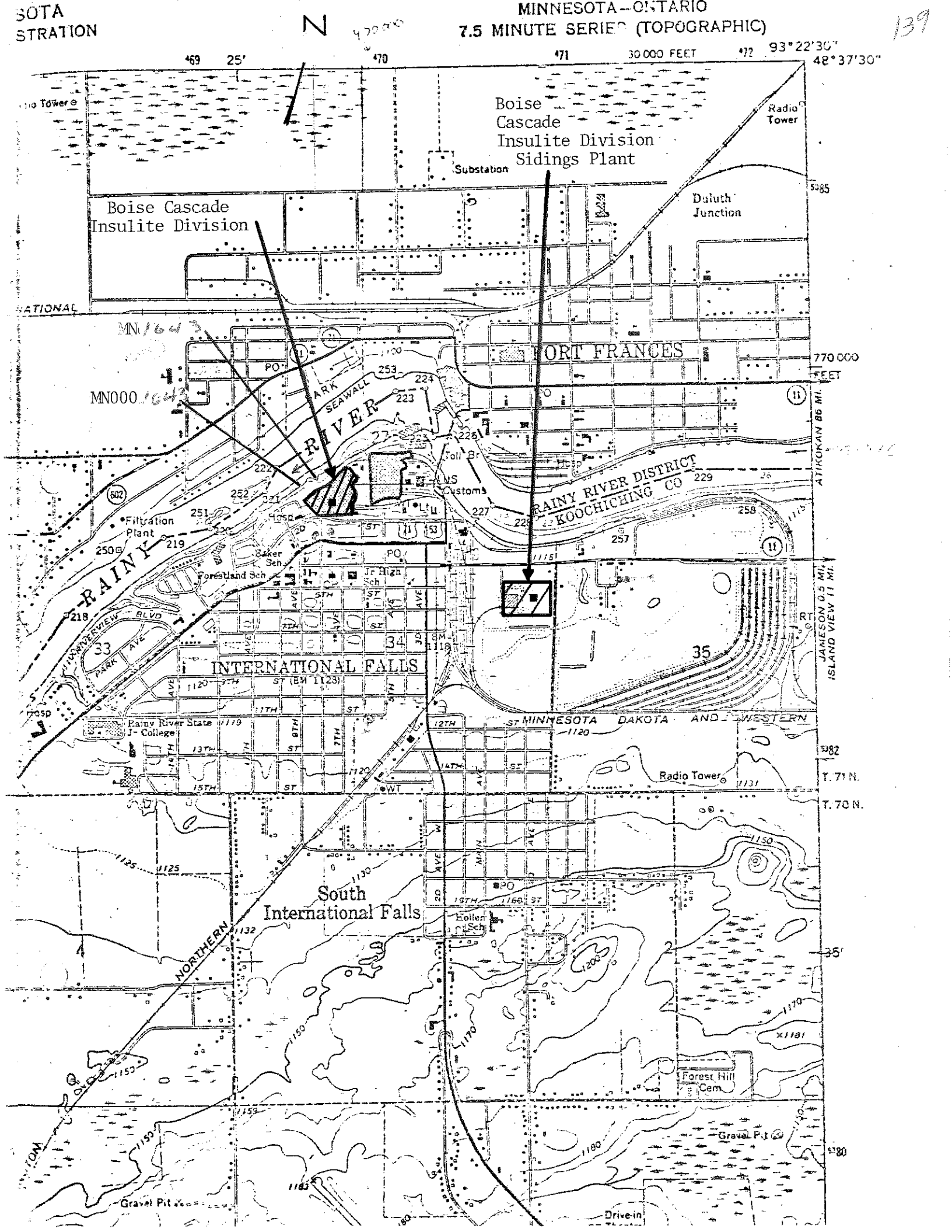
Waste Oil Storage

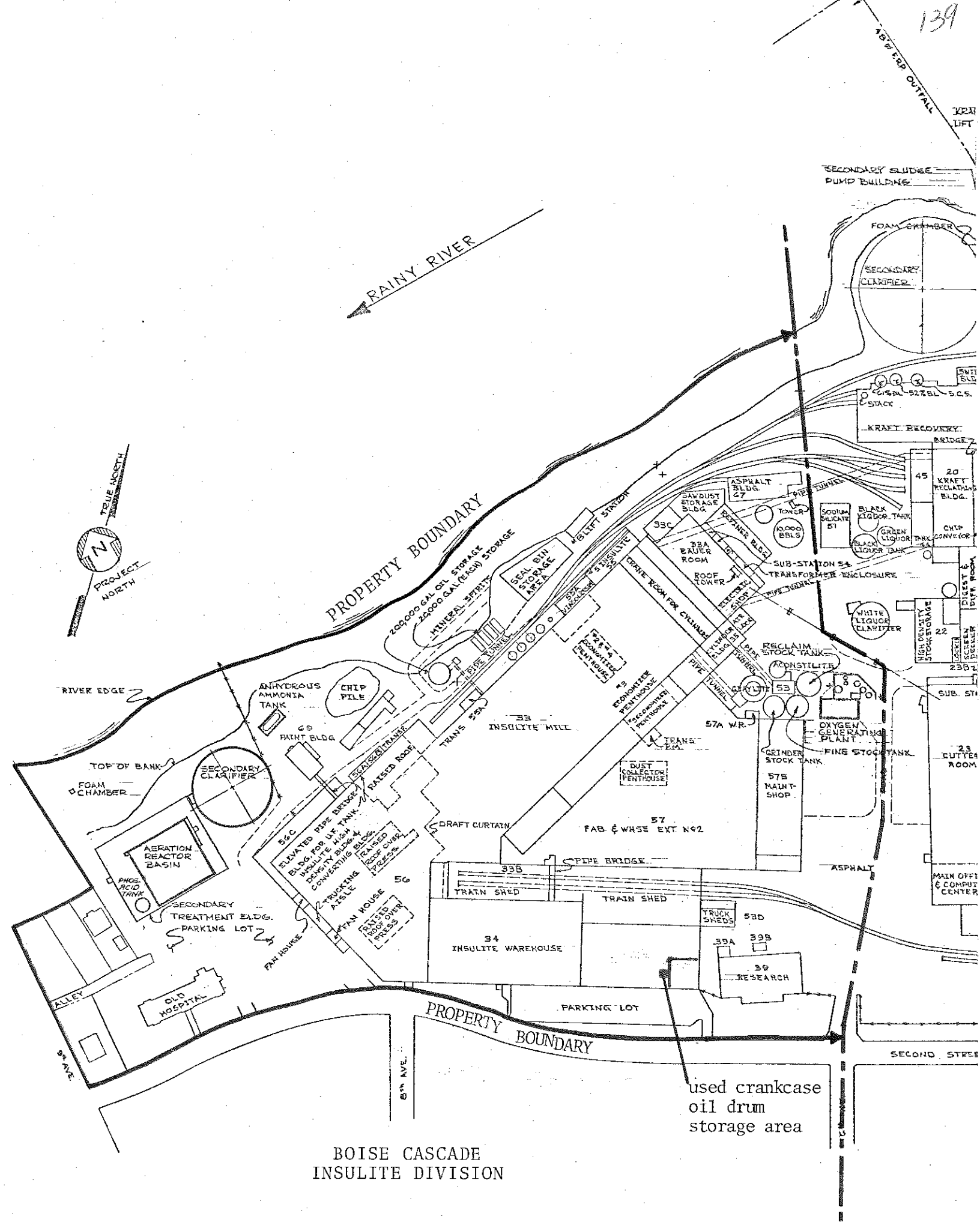
Attachment For EPA Form 3 Item VI



AERIAL Photo Insulite Mill

WASTE Paint Sludge Storage


SOTA
STRATION
N
MINNESOTA—ONTARIO
7.5 MINUTE SERIES (TOPOGRAPHIC)
93°22'30"
48°37'30"
469
25'
470
471
30 000 FEET
472
Boise Cascade Insulite Division Sidings Plant
Boise Cascade Insulite Division
Substation
Radio Tower
Duluth Junction
MN1643
MN000 1643
FORT FRANCES
770 000 FEET
PARK
SEAWALL
RIVER
Toll Br
US Customs
RAINY RIVER DISTRICT
KOOCHICHING CO
ATIKOKAN 86 MI.
JANESON 0.5 MI.
ISLAND VIEW 11 MI.
Filtration Plant
Hosp
Baker Sch
Forestland Sch
Jr High Sch
RAINY
INTERNATIONAL FALLS
MINNESOTA DAKOTA AND WESTERN
Rainy River State J- College
Radio Tower
T. 71 N.
T. 70 N.
South International Falls
NORTHERN
Hollen Sch
Forest Hill Cem
Gravel Pit
Drive-in
5385
5382
5380
139



BOISE CASCADE
INSULITE DIVISION

Attachment Item VA

Scale 1:1200

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Paper Group

1600 S.W. 4th Avenue
P.O. Box 1414
Portland, Oregon 97207
(503) 224-7250

Boise Cascade

November 14, 1980

Environmental Protection
Agency Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680

Attention: Mr. Y. J. Kim

Dear Mr. Kim:

Enclosed is a Hazardous Waste Permit application form 1 and form 3 required by November 19, 1980, according to regulations implementing the Resource Conservation and Recovery Act of 1976. This permit application is for Boise Cascade Insulite at International Falls, Minnesota.

As you are probably well aware, the RCRA regulations are extremely complex. Based upon our interpretation, industry evaluations, and EPA staff guidance of these regulations, we submit the enclosed forms as complete to our best technical judgement.

If you should have any questions, please feel free to contact me directly or the official contact indicated on Form 1.

Very truly yours,

Richard D. Just/sub

Richard D. Just

may be duplicate copy of 131

Paper Group

Boise Cascade

Central Engineering
International Falls, Minnesota 56649
218/285-5011
Telex 29-4455

August 15, 1980

EPA-Region V
RCRA Activities
P. O. Box 7861
Chicago, IL 60680

Dear Sir:

Enclosed is a hazardous waste Notification form required by August 18, 1980, according to regulations implementing the Resource Conservation and Recovery Act of 1976. This Notification is for Boise Cascade's Paper Group mill at International Falls, Minnesota.

Boise Cascade has two different manufacturing operations located at International Falls, MN. One is an Insulite fiberboard operation and the second a bleached kraft pulp and paper mill. Two EPA forms for this reporting were sent to the Insulite mill with only one identifying EPA number. Consequently, these two mills have reported separately but have used the same number. If there are any problems with this approach, please let me know.

As you're probably well aware, these RCRA regulations are extremely complex. Based upon our interpretation of those regulations, we have attempted to provide a Notification which may be needed for our facility. If you should have any questions, please feel free to contact me directly, or the official contact indicated on the Notification itself.

Yours truly,

Russ Summer

Russ Summer
Regional Environmental Engineer

RES:gmg

AUG 18 1980

Attachment I to EPA Form 8700-13A

EPA I.D. NO. MND980700884

The status of "non-handler" applies to 1983 and is anticipated to remain permanently. However, due to the ambiguous definition given for non-handler, we are submitting the following information.

We currently are temporarily storing approximately 100 drums of solvent based paint wastes generated during the period September 22, 1980 - February 14, 1981, co-mingled with 3400 drums of water based paint wastes generated September 22, 1980 - December 18, 1983.

The disposal of these wastes had been in a state of limbo since early 1981, pending evaluation and final approval by the Minnesota Pollution Control Agency for permit authorization to land-fill the water based waste. Approval was finalized by the State with Permit No. SW-258 dated November 21, 1983.

We will be submitting our closure plan to the MPCA by March 15, 1984. Segregation and ultimate disposal of the solvent based wastes will take place in mid 1984.

2/7/84

RGL/bjp

Do not make entries in shaded a[illegible] OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

(1) Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

T/A C

1	2											13	14	15
F	M	N	D	9	8	0	7	0	0	8	8	4		1

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☒ Permanently
See attachment I
☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

30 B I S E C A S C A D E H A R D B O A R D M A N U F A C T U R I N G 69

IV. INSTALLATION MAILING ADDRESS

15 16 3 2nd STREET 45
Street or P.O. Box

15 16 4 INTERNATIONAL FALLS 41 42 MN 47 56649 51
City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

15 16 5 45
Street or Route number

15 16 6 41 42 47 51
City or Town State Zip Code

VI. INSTALLATION CONTACT

15 16 7 LEEN RONALD 45
Name (last and first)

46 218-285-5351 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Albert N. Turenne	Plant Manager	Albert N. Turenne	2/23/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

Tear out here

Do not make entries in shaded

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☐

Explain your non-regulated status in the space below.

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

1	2	3	4	5	6	7	8	9	10	11	12	13	T/A C 14	15
F	M	N	D	9	8	0	7	0	8	8	4		1	

This Facility's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other (explain in comment section)

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

30 BOISE CASCADE HARDBOARD MANUFACTURING 69

IV. FACILITY MAILING ADDRESS

15 16 3 2nd Street 45

Street or P.O. Box

15 16 4 International Falls 41 42 MN 47 56649 51

City or Town State Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

15 16 5 45

Street or Route number

15 16 6 41 42 47 51

City or Town State Zip Code

VI. FACILITY CONTACT

15 16 2 LEEN RONALD 45

Name (last and first)

46 218-285-5351 55

Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

A. Cost Estimate for Facility Closure: $ 16 , 19 37000 22

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only): $ 25 , 28 , 31

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Albert N. Turenne	Plant Manager	Albert N. Turenne	2/23/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA Form 8700-13B(5-80) (Revised 11-83)

Tear out here

Do not make entries in shaded are

ENVIRONMENTAL PROTECTION AG[illegible]Y

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: ________ Rec'd by: ________

IX. FACILITY'S EPA I.D. NO. T/A C

F M N 0 9 8 0 7 0 0 8 4 1

X. GENERATOR'S EPA I.D. NO.

G M N D 9 8 0 7 0 0 8 4

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Boise Cascade Hardboard Manufacturing

ON-SITE ☒

XII. GENERATOR ADDRESS

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

	Amount of Waste	UOM
S01	15000	P
S02		
S03		
S04		
S05		

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
	1	mixture of spent xylene and clean-up material from solvent painting operation	F003 D001	501	15000	P
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

XIII - Waste in storage was generated from Sept. 1980 - Feb. 1981. Disposal of wastes will take place mid 1984 at which time the facility will be closed.

Tear out here

A.4 Closure/Post-Closure

MND 980 700 884
listed as

N/A

Paper Group

International Falls, Minnesota 56649
218/285-5011

Boise Cascade

Also Out of Business

February 12, 1986

-- CERTIFIED MAIL --

RCRA Activities
Region V
P.O. Box A3587
Chicago, IL 60690

Attention: ATKJG

Subject: Boise Cascade Corporation Insulite Division
International Falls, Minnesota
EPA ID #MND980700884

Ladies and Gentlemen:

In response to David Stringham's recent letter concerning the corrective action requirements of the hazardous and solid waste amendments of 1984, enclosed is a letter sent to Boise Cascade by the Minnesota Pollution Control Agency (MPCA) declaring that the company's waste storage facility is "officially closed in accordance with interim status standards for treatment, storage and disposal facilities". Since the MPCA has formally terminated the storage facility's interim status, we believe no further action by EPA-Region V is necessary.

In accordance with the instructions found in Mr. Stringham's letter, I am returning unsigned the certification statement provided by the agency. Please send any further correspondence concerning this matter directly to my attention at the address found on this letter.

Sincerely,

James M. Rischar

James M. Rischar
Resident Manager

JMR:gal

Enclosures

Minnesota Pollution Control Agency

April 1, 1985

Mr. Paul Thomsen
Technical Services Superintendent
Boise Cascade Corporation
Timber and Wood Products Group
International Falls, Minnesota 56649

Dear Mr. Thomsen:

RE: Certification of Facility Closure
Boise Cascade Corporation - Insulite Division
Hardboard Products Group
International Falls, Minnesota
MND980700884 G, PA-9

On February 11, 1985, we received final authorization from the U.S. Environmental Protection Agency (EPA) to administer the State hazardous waste program in lieu of the federal program. We are now responsible for determining that your hazardous waste container storage facility is closed in accordance with the applicable closure requirements. We have received a certification of closure and related information for the facility as follows:

1. A letter dated November 12, 1984 to the EPA regional administrator from Boise Cascade with attached certification that barrel sorting was done with the barrels awaiting shipment and that the storage area was washed down.

2. A letter dated December 27, 1984 to the Minnesota Pollution Control Agency (MPCA) from Barr Engineering Company with attached hazardous waste shipping manifests.

3. A letter dated January 24, 1985 to the MPCA from Barr Engineering Company with attached hazardous waste shipping manifest.

Receipt of the closure certifications and shipping manifests complete the regulatory steps necessary to change the facility's status to closed. Therefore, we hereby declare that the container storage facility is officially closed in accordance with interim status standards for treatment, storage and disposal facilities.

Phone: 612/296-7301
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

You should note that the EPA is responsible for implementing the Hazardous and Solid Waste Amendments (HSWA) of 1984 which contain several new requirements for the management of hazardous waste. The MPCA has not been authorized to implement these new requirements in lieu of EPA. Should any actions by you be required to comply with the HSWA you will be notified by EPA directly.

Feel free to contact Mr. George Pruchnofski of the Solid and Hazardous Waste Division at 612/296-7266 if you have any questions or comments regarding this closure.

Sincerely,

Thomas J. Kalitowski
Executive Director

TJK:cj

cc: Ken Chiu, U.S. Environmental Protection Agency, Chicago
Rose Freeman, U.S. Environmental Protection Agency, Chicago

Timber and Wood Products Group

Hardboard Products
International Falls, Minnesota 56649
(218) 285-5011

Boise Cascade

January 21, 1985

Mr. Darryl J. Weakley
Hazardous Waste Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division
Minnesota Pollution Control Agency
1935 West County Road B2
Roseville, Minnesota 55113-2785

Dear Mr. Weakley:

Enclosed are the documents related to the closure of the Insulite hazardous waste storage area at the sidings plant. If you have any questions, please contact me. I would appreciate written approval at your convenience.

Sincerely,

Paul Thomsen

Paul Thomsen
Technical Services Superintendent

BARR ENGINEERING CO.
CONSULTING ENGINEERS

DOUGLAS W. BARR
JOHN D. DICKSON
L. R. MOLSATHER
ALLAN GEBHARD
LEONARD J. KREMER
DENNIS E. PALMER

6800 FRANCE AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55435-2062
TELEPHONE (AREA 612) 920-0655

January 24, 1985

Mr. Dale Wikre
Minnesota Pollution Control AGency
1935 West County Road B2
Roseville, Minnesota 55113

Dear Mr. Wikre:

On behalf of Boise Cascade, Timber and Wood Products Group, Hardboard Products, International Falls, Minnesota, we are submitting this letter to follow-up our December 27, 1984 letter regarding manifests of waste from the Sidings Paint Waste Project. All shipments of hazardous waste from the site have now been received at the disposal facility.

The one rejected drum from manifest 54-001 has been repackaged into two drums, given manifest number 54-003 and has been received at Fondessy Enterprises. Manifest 54-003 has been executed and returned to Boise Cascade. Copies of the fully executed manifest and disposal certificate are enclosed.

Please contact me if there are any questions.

Yours truly,

James R. Langseth

James R. Langseth

JRL/111
enc.
c: Director, MPCA
Paul Klinge, MPCA
Larry Livesay, MPCA
Ken Skahn, U.S. EPA, Region V
Paul Thomsen, Boise Cascade

Acceptance # C719 B1 083

Please print or type (Form designed for use on elite (12-pitch) typewriter.) 5 Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND 980700884 Manifest Document No. 2. Page 1 of 1

Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address: Boise Cascade - Hardboard Manufacturing, 400 Second Street, International Falls, MN 56649

4. Generator's Phone (218) 285-5351

A. State Manifest Document Number: 54-01B

B. State Generator's ID

5. Transporter 1 Company Name: G+T Trucking

6. US EPA ID Number: MND 064770266

C. State Transporter's ID: TR0022

D. Transporter's Phone (612) 461-2180

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address: Fondessy Enterprises, Inc., 876 Otter Creek Rd., Oregon, Ohio 43616

10. US EPA ID Number: OHD 045243706

G. State Facility's ID: 03-48-0092

H. Facility's Phone: (419) 726-1521

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Flammable Waste, solid, n.o.s. Flammable solid UN 1325	2	DM	557	P	D001 D005 D006
b.							
c.							
d.							

RECEIVED JAN 25 1985 MINN. POLLUTION CONTROL AGENCY

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: SCIF-811HDP/

15. Special Handling Instructions and Additional Information

Clean up spills immediately using non-sparking tools

Notify O.H. Materials @ (612) 935-4804

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month	Day	Year
John D. Dickson	John D. Dickson	1	5	85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
~~Howard~~ HOWARD ANDERSON	Howard Anderson	1	7	85

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month	Day	Year
MARK Douglas	Mark Douglas	1	9	85

Style F15-6 Labelmaster, Chicago, IL 60646 (312) 478-0900 EPA Form 8700-22 (3-84)

ORIGINAL - RETURN TO GENERATOR

A Fondessy Enterprises, Inc.
Associated Chemical and Environmental Services, Inc.
876 Otter Creek Road
Oregon, OH 43616

USEPA ID OHD 045243706
Ohio EPA 03-48-0092

CERTIFICATE OF DISPOSAL

PART A — Generator Information

Generator Name Boise Cascade Generator USEPA ID# [illegible]

Manifest Document No. 54223

PART B — Waste Disposal Information

Product Code Number	Disposal Date Mo. Day Year	Disposal Method	Container No.	Container Type	Weight
719-BT	1 19 '95	D131	2	DRS	.85 T
					850.91 [illegible]

Disposal Method = D081-Landfill; D082-Landfarm; T04-Treatment

Container Types = DR-Drum; TR-Truck; CT-Cargo Tanker; VT-Vacuum Tanker; RO-Rolloff

Cell H
588 To 590 Reveal
31-U-MM-NN

I certify receipt and disposal of the above identified wastes at this facility. I certify that the above described wastes were disposed according to all applicable state & federal permits and requirements imposed by the generator.

SIGNATURE [signature]

DATE 1-3-95

TITLE [illegible]

DISTRIBUTION OF COPIES
WHITE — Office
CANARY — Generator
PINK — EPA

RECEIVED
JAN 25 1995
MINN. POLLUTION CONTROL AGENCY

H.W. Enf.
P 2 D.W.

BARR ENGINEERING CO.
CONSULTING ENGINEERS

DOUGLAS W. BARR
JOHN D. DICKSON
L. R. MOLSATHER
ALLAN GEBHARD
LEONARD J. KREMER
DENNIS E. PALMER

6800 FRANCE AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55435-2062
TELEPHONE (AREA 612) 920-0655

December 27, 1984

Mr. Dale Wikre
Minnesota Pollution Control Agency
1935 West County Road B-2
Roseville, Minnesota 55113

Dear Mr. Wikre:

On behalf of Boise Cascade, Timber and Wood Products Group, Hardboard Products, International Falls, Minnesota, we are submitting this letter regarding manifests of waste from the Sidings Paint Waste Project. Forty-five days have passed since certain shipments of hazardous waste left the site and this letter describes the status of those shipments.

Manifest 54-001, material shipped from the Sidings Paint Waste Project, has been received by Boise Cascade, but one drum was rejected at the disposal facility.

We have inquired of the contractor, the disposal facility and the trucking firm regarding the status of the material from this manifest. The contractor is O.H. Materials, 1513 East Excelsior Boulevard, Box 427, Hopkins, Minnesota 55343, phone 612/935-4804; the disposal facility is Fondessy Enterprises, Inc., 876 Otter Creek Road, Oregon, Ohio 43616, phone 419/726-1521; and the transporter is G & T Trucking, 11111 Deuce Road, Elko, Minnesota 55020, phone 612/461-2180.

One drum from manifest 54-001 was rejected at Fondessy due to the presence of free liquid in a drum designated as containing only solid material. That drum was returned to G & T Trucking in Elko, Minnesota, was repackaged into two drums, solidified, and will be shipped to Fondessy along with the material currently listed on manifest 41-114. It is anticipated that this material will be shipped on December 27 or 28, 1984.

Please contact me with any comments or questions you may have regarding this matter (612/920-0655).

Yours truly,

James R. Langseth

JRL/tmk

c: Director, MPCA
Paul Klinge, MPCA
Larry Livesay, MPCA
Ken Skahn, U.S. EPA, Region V
Paul Thomsen, Boise Cascade

Print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 7-31-88

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. MND 980 700 884	Manifest Document No. 5 2	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Boise Cascade - Hardboard Manufacturing
400 Second St
International Falls, MN 56649
4. Generator's Phone (218) 285-5351

A. State Manifest Document Number: 54-001
B. State Generator's ID:

5. Transporter 1 Company Name: G+T Trucking
6. US EPA ID Number: MND064770266
C. State Transporter's ID: 5K0622
D. Transporter's Phone: 612-461-[illegible]

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
Fondessy Enterprises, Inc.
876 Otter Creek Rd.
Oregon, Ohio 43616
10. US EPA ID Number: OHD045243706
G. State Facility's ID: 03-48-0092
H. Facility's Phone: 419-726-1521

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Flammable Waste Solid N.O.S. ~~ORM-E UN1325~~ MA	X	~~33~~	DM		P	D001
b.	FLAMMABLE SOLID n.o.s. UN1325 ACCEPTANCE 0719 CT (MA)		32		23716	P	
c.					11.86	T	
d.							

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: D81

15. Special Handling Instructions and Additional Information
clean-up spills immediately - non-sparking tools

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date (Month Day Year)
Ronald G. Leen	Ronald G. Leen	11 2 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)
George Stage	George Stage	11 2 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)

19. Discrepancy Indication Space
1 Drum rejected because it does not meet PCN requirements
contains free liquid no room for solidification

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
D81 SCL-Cell H

Printed/Typed Name	Signature	Date (Month Day Year)
Dale M Pertner	Dale M Pertner	11 10 87

Style F15-6 Labelmaster, Chicago, IL 60646 (312) 478-0900

EPA Form 8700-22 (3-84)

ORIGINAL--RETURN TO GENERATOR

Timber and Wood Products Group

Boise Cascade

Insulite Division
International Falls, Minnesota 56649
(218) 285-5011

November 12, 1984

Regional Administrator
U.S. EPA Region V
RCRA Activities
Box 3587
Chicago, IL 60690

Subject: Certification of Hazardous Waste Storage Facility Closure
U.S. EPA ID# MND 980-700-884
Boise Cascade Hardboard Products
400 2nd Street
International Falls, MN 56649

Dear Sir:

This letter, and the attached letter from an independent registered engineer, certifies that the closure of the Hazardous Waste Storage Facility referenced above has been completed according to the closure plan as submitted to your office on March 14, 1984 and ammended on April 20, 1984. The letters are submitted as required by 40 CFR, Subpart G, paragraph 265.115 (Certification of Closure).

As a result of this closure, I respectfully request withdrawal of the Part A hazardous waste permit application for this facility.

As provided in the changes to the regulations promulgated in 48 CFR 39,611, (September 1, 1983), authority to sign this document has been delegated to me in accordance with corporate procedures.

I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information. The information submitted is, to the best, of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Further correspondence concerning this matter should be directed to:

Ronald G. Leen (Facility Contact)
Boise Cascade Hardboard Products
400 2nd Street
International Falls, MN 56649

Telephone (218) 285-5351

Sincerely,

Macon Lowe
Midwest Area Manager
Boise Cascade Timber & Wood Products

BARTLETT AND ASSOCIATES
CONSULTING ENGINEERS
BOX 1240 - SECOND ST AT FOURTH AVE - INTERNATIONAL FALLS, MN 56649
(218) 285-7409

Regional Administrator
U. S. Environmental Protection Agency
Region V
RCRA Activities
Box 3587
Chicago, Ill. 60690

SUBJECT: Certification of Closure
Boise Cascade Hardboard Products
USEPA Identification:
MND - 980 - 700 - 884

Gentlemen:

During the months of June, July, August, September, and October, 1984, Boise Cascade Corporation's Hardboard Products Division in Int'l. Falls was engaged in closing the hazardous waste storage facility at their Int'l. Falls sidings plant. The closure process was described in the closure plan negotiated between Boise Cascade and the agency prior to our involvement. The plan required a careful sort by date code of over 3100 barrels which contained wastes, testing of suspect barrels for the presence of Xylene, obtaining a qualified disposal contractor to dispose of the hazardous wastes and washing down the area. We are certifying that:

1. The barrel sort was done.

2. The testing of 1208 sorted barrels which could have had Xylene in them was done. Testing was done by Boise Cascade Corporation personnel so while we know the test was done. We are not certifying to the accuracy of the testing.

3. The area was washed down.

I certify that this report was prepared by me or under my direct supervision and that I am a duly registered P.E. under the laws of the State of Minnesota.

John D. Bartlett, P.E.

John D. Bartlett

Reg. #10228
11/12/84

Timber and Wood Products Group

Hardboard Products
International Falls, Minnesota 56649
(218) 285-5011

Boise Cascade

February 11, 1985

Mr. Ken Chiu
Solid Waste Branch
5HW-12
U.S. EPA Region V
230 S. Dearborn St.
Chicago, IL 60604

SUBJECT: Certification of Hazardous Waste Storage Facility Closure
U.S. EPA ID# MND 980-700-884 GPA-9
Boise Cascade Hardboard Products
400 Second Street
International Falls, MN 56649

Dear Mr. Chiu:

Enclosed is a copy of the letter certifying closure of the temporary Hazardous Waste Storage Facility formerly operated by Boise Cascade. The letter was sent to the Regional Administrator on November 12, 1984.

If you have any further questions regarding this issue, please contact me at 218/285-5458.

Sincerely,

Paul Thomsen
Technical Services Superintendent

PT:jb
enclosure

Timber and Wood Products Group

Boise Cascade

Insulite Division
International Falls, Minnesota 56649
(218) 285-5011

November 12, 1984

Regional Administrator
U.S. EPA Region V
RCRA Activities
Box 3587
Chicago, IL 60690

Subject: Certification of Hazardous Waste Storage Facility Closure
U.S. EPA ID# MND 980-700-884
Boise Cascade Hardboard Products
400 2nd Street
International Falls, MN 56649

Dear Sir:

This letter, and the attached letter from an independent registered engineer, certifies that the closure of the Hazardous Waste Storage Facility referenced above has been completed according to the closure plan as submitted to your office on March 14, 1984 and ammended on April 20, 1984. The letters are submitted as required by 40 CFR, Subpart G, paragraph 265.115 (Certification of Closure).

As a result of this closure, I respectfully request withdrawal of the Part A hazardous waste permit application for this facility.

As provided in the changes to the regulations promulgated in 48 CFR 39,611, (September 1, 1983), authority to sign this document has been delegated to me in accordance with corporate procedures.

I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information. The information submitted is, to the best, of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Further correspondence concerning this matter should be directed to:

Ronald G. Leen (Facility Contact)
Boise Cascade Hardboard Products
400 2nd Street
International Falls, MN 56649

Telephone (218) 285-5351

Sincerely,

Macon Lowe
Midwest Area Manager
Boise Cascade Timber & Wood Products

BARTLETT AND ASSOCIATES
CONSULTING ENGINEERS
BOX 1240 - SECOND ST AT FOURTH AVE. - INTERNATIONAL FALLS, MN 56649
(218) 285-7409

Regional Administrator
U. S. Environmental Protection Agency
Region V
RCRA Activities
Box 3587
Chicago, Ill. 60690

SUBJECT: Certification of Closure
Boise Cascade Hardboard Products
USEPA Identification:
MND - 980 - 700 - 884

Gentlemen:

During the months of June, July, August, September, and October, 1984, Boise Cascade Corporation's Hardboard Products Division in Int'l. Falls was engaged in closing the hazardous waste storage facility at their Int'l. Falls sidings plant. The closure process was described in the closure plan negotiated between Boise Cascade and the agency prior to our involvement. The plan required a careful sort by date code of over 3100 barrels which contained wastes, testing of suspect barrels for the presence of Xylene, obtaining a qualified disposal contractor to dispose of the hazardous wastes and washing down the area. We are certifying that:

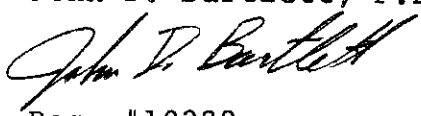
1. The barrel sort was done.

2. The testing of 1208 sorted barrels which could have had Xylene in them was done. Testing was done by Boise Cascade Corporation personnel so while we know the test was done. We are not certifying to the accuracy of the testing.

3. The area was washed down.

I certify that this report was prepared by me or under my direct supervision and that I am a duly registered P.E. under the laws of the State of Minnesota.

John D. Bartlett, P.E.



Reg. #10228
11/12/84

SHW-13

JUL 3 1 1984

Mr. Donald G. Leen
Boise Cascade Corporation
Insulite Manufacturing Division
400 East 2nd Street
International Falls, MN. 56649

RE: Approval of BCIC Final Closure Plan

Facility Name: Boise Cascade Corporation
Insulite Manufacturing Division
U.S. EPA ID No.: MND 980 758 884

Dear Mr. Leen:

This is to advise you that the closure plan for the Boise Cascade Corporation, Insulite Manufacturing Division, is approved. The public comment period ended July 16, 1984, and no comment was received.

You may now proceed with closure of the facility in accordance with the approved plan. Closure activities must be completed within 180 days after approval of the closure plan. When closure is completed, the owner or operator must submit to the Regional Administrator certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. A site inspection may be conducted by the Minnesota Pollution Control Agency (MPCA) to verify proper closure. Upon submittal of closure certification and concurrence of the MPCA, we will advise you of the facility's change in status.

Closure in accordance with the approved plan does not preclude enforcement actions pursuant to Minnesota laws, rules, or regulations or to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

If you have any question, please contact Ken Chin of my staff, at (312) 886-6181.

Sincerely,

Basil S. Constantelos, Director
Waste Management Division

cc: Steve Reed, MPCA
E. Prachansri, MPCA

bcc: Ken Skahn, SIO
Rich Bell, SS
Part A file

SHW-13:K.Chin:C.Words:7/18/84

INITIALS / DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
	Y.W. 7-18-84	K.C. 7/18/84		CJB 7/23/84			KK 7/27/84	KK for BC 7/27/84

asp 7/24/84

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: July 23,1984
Boise

SUBJECT: Closure-C ascade

FROM: Christine Klemme, EPA
RAIU

TO: Kenneth Chiu

The comment period ended on July 16, 1984, for Boise Cascade's closure plan comment period. No comments were received.

Minnesota Pollution Control Agency

June 1, 1984

Mr. Kenneth Skahn
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Skahn:

Re: RCRA Closure Plan
Boise Cascade Corporation
Insulite Division
International Falls, Minnesota
Number: MND 980200884 (Task 2, Output 2)

We have completed our review of the amended RCRA closure plan for the container storage facility at Boise Cascade Corporation's Insulite Division plant in International Falls. Based upon our review and discussions with Mr. Ken Chiu of your offices, we recommend that the plan be approved. A copy of the amended plan is included for your reference.

In summary, the closure plan calls for segregation of drums containing hazardous waste and shipment of the waste to an approved hazardous waste disposal facility. The waste consists of solvent based paints that were used in coating operations at the plant. In February, 1981, the plant stopped using solvent based paints thereby eliminating generation of the hazardous waste. The drums of hazardous waste have been stored on site since that time. These drums are intermixed with a large number of drums containing nonhazardous waste. Therefore, segregation of the drums is required prior to shipment. Boise Cascade has estimated that approximately 100 drums of hazardous waste will require disposal. In addition to the segregation and disposal procedures, the closure plan includes additional information necessary to assure compliance with the closure requirements of 40 CFR Part 265.

Phone: 612/296-7278
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester
Equal Opportunity Employer

During closure, the Minnesota Pollution Control Agency (MPCA) staff will conduct a site inspection and track the hazardous waste shipment manifests. These measures should assure closure is in accordance with the approved plan.

If you should have any comments or questions regarding this matter, please contact George Pruchnofski at 612/296-7266 or Darryl Weakley at 612/296-7277.

Sincerely,

Greg Pederson

Greg L. Pederson, Supervisor
Hazardous Waste Permit and Review Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

GLP/GJP:ch

cc: Mr. Ken Chiu, EPA, Chicago
Mr. Richard Dell, EPA, Chicago

3/9/84

Facility: Boise Cascade Corporation
Hardboard Manufacturing Division
2nd Street
International Falls, Minnesota 56649

EPA I.D. MND 980700884

Description of Waste:

EPA Hazardous Waste No: F003, D001

Waste is being stored in 55 gallon barrels and consists of spent xylene, dried paint, and clean-up material (polyethylene drop-cloths, absorbent material and rags from industrial painting of siding products. The volume of free liquid in the barrels is estimated at 5 gallons average.

There are approximately 100 barrels of solvent based paint wastes commingled with 3300 barrels of water based paint wastes.

Estimated amount of hazardous wastes: 15000 lbs.

Estimated closure costs: $37,000

Closure Date: Mid 1984 - barrel segregation and testing to begin when weather permits.

Closure Procedure:

A. Outline of plan - Figure I

B. Description of plan

1. Step I - Segregation by Date Codes

Two types of date information are available on the barrels. (1) DOT tested date and, (2) paint manufacturers date. All barrels that have confirmed dates prior to February 15, 1981 and barrels where dates cannot be confirmed, will be analyzed for solvent content. February 14, 1981 is the last day solvent based paints were used in coating operation.

2. Step II - Analyze for Xylene

II-A. Initial screening of barrels suspected of containing xylene (based on date codes) will be accomplished with the MSA Combustible Gas Indicator Model 40. Readings of less than 60 on meter (60% of LEL) will pose no significant environmental effect as the barrels will contain minimal amounts of xyelene (< 200 cc). The graph in Fig. II was determined by selecting a barrel of waste with an original MSA reading close to zero (.4). Incremental additions of xylene were placed in barrel and corresponding MSA readings taken. After each increment the barrel was sealed for a minimum of 48 hours to allow equilibrium to be reached in headspace. The MSA readings were taken by removing the bung from the top of the barrel and inserting sample line.

II-B. Barrels with MSA readings greater than 60 will be sampled and analyzed to confirm presence of xylene. A one (1) ml sample vial is placed through bung opening and held for two minutes, withdrawn, and capped immediately with seal and septa. Sample is then analyzed for xylene on a Hewlett Packard 5880A Gas Chromatograph. (See attached chromatograms) A DB-5 30 meter, wide bore, capillary column is used. Injector temperature of 250°C and detector temperature of 350°C. The run is made isothermally at 50°C. No attempt to quantify amount of xylene was made. Any barrels confirmed as containing xylene will be treated as a harzardous waste. Testing shows that 10cc of xylene placed in barrel can be detected (sample (A) chromatograms) by this method.

3. Step III - Hazardous Waste Disposal

All barrels confirmed as containing significant amounts of xylene will be treated as hazardous waste. Barrels will be inspected for integrity and over packs used where necessary. Wastes will be transported and disposed of by EPA permitted companies. These companies will be determined when we know the extent of the wastes to be disposed.

4. Step IV - Non-hazardous Wastes Disposal

Wastes determined to contain non-hazardous material will be disposed of by method previously approved by MPCA for water based paint wastes.

RL/bjp

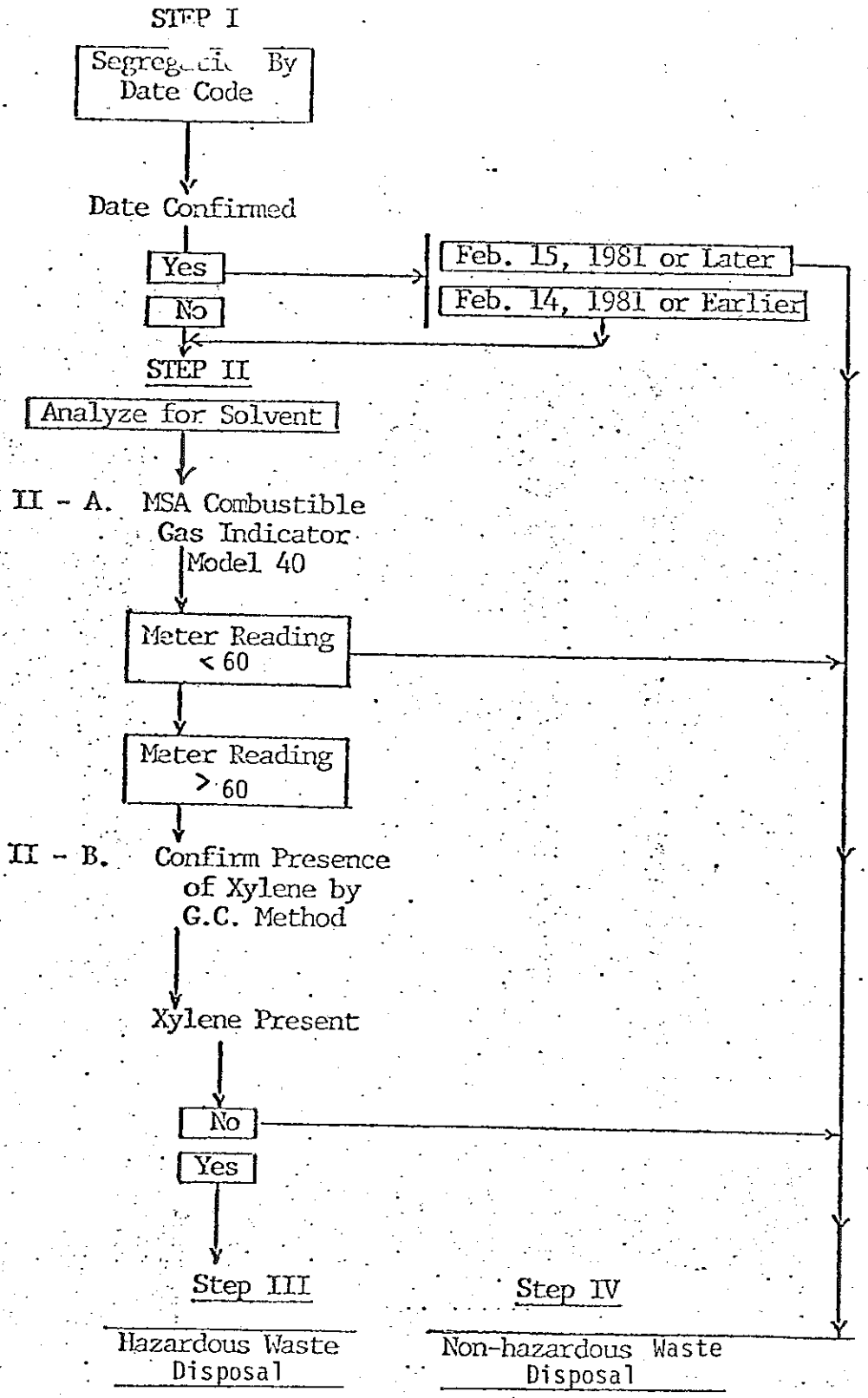
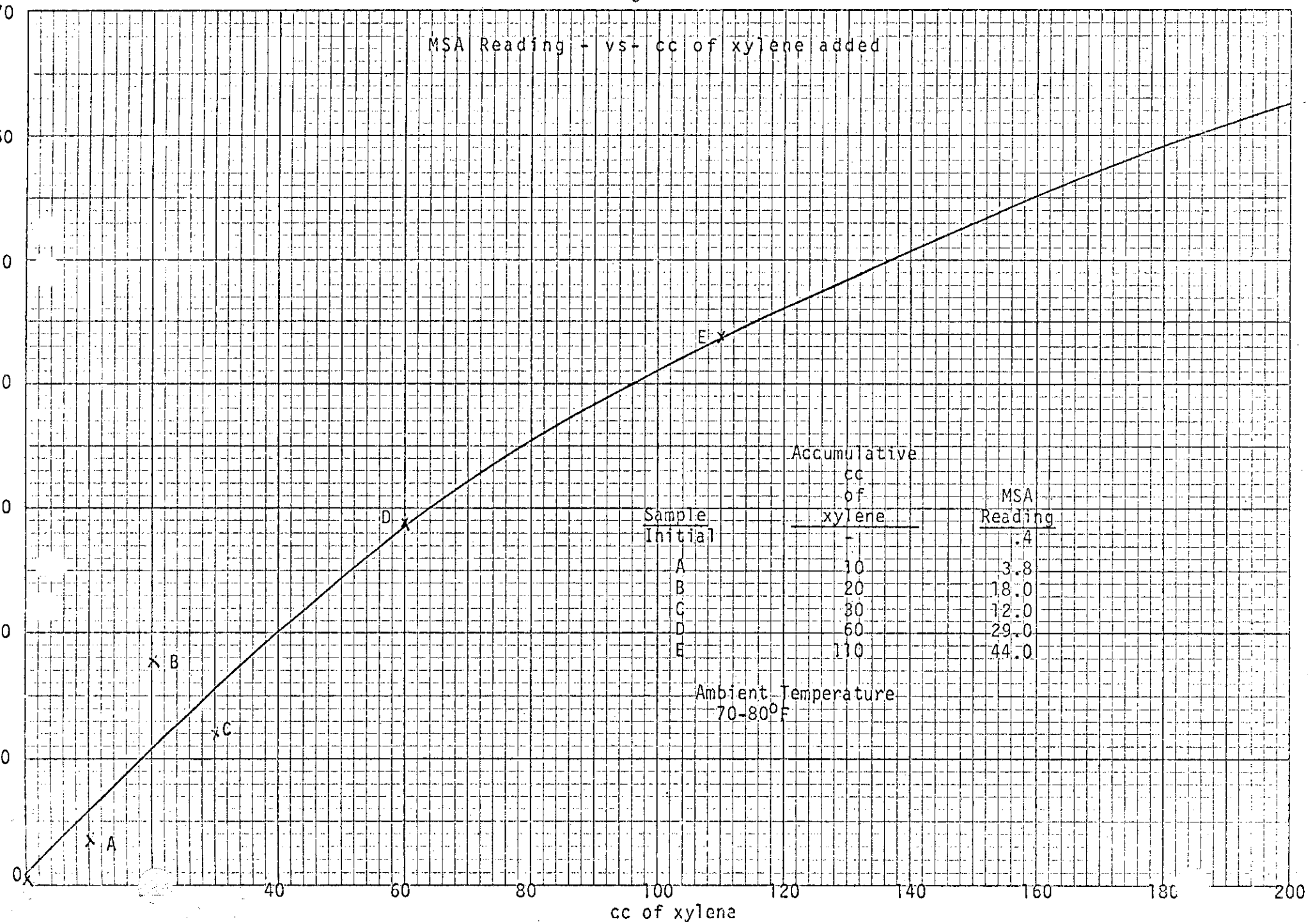

STEP I
Segregation By Date Code
Date Confirmed
Yes
No
Feb. 15, 1981 or Later
Feb. 14, 1981 or Earlier
STEP II
Analyze for Solvent
II - A. MSA Combustible Gas Indicator Model 40
Meter Reading < 60
Meter Reading > 60
II - B. Confirm Presence of Xylene by G.C. Method
Xylene Present
No
Yes
Step III
Hazardous Waste Disposal
Step IV
Non-hazardous Waste Disposal

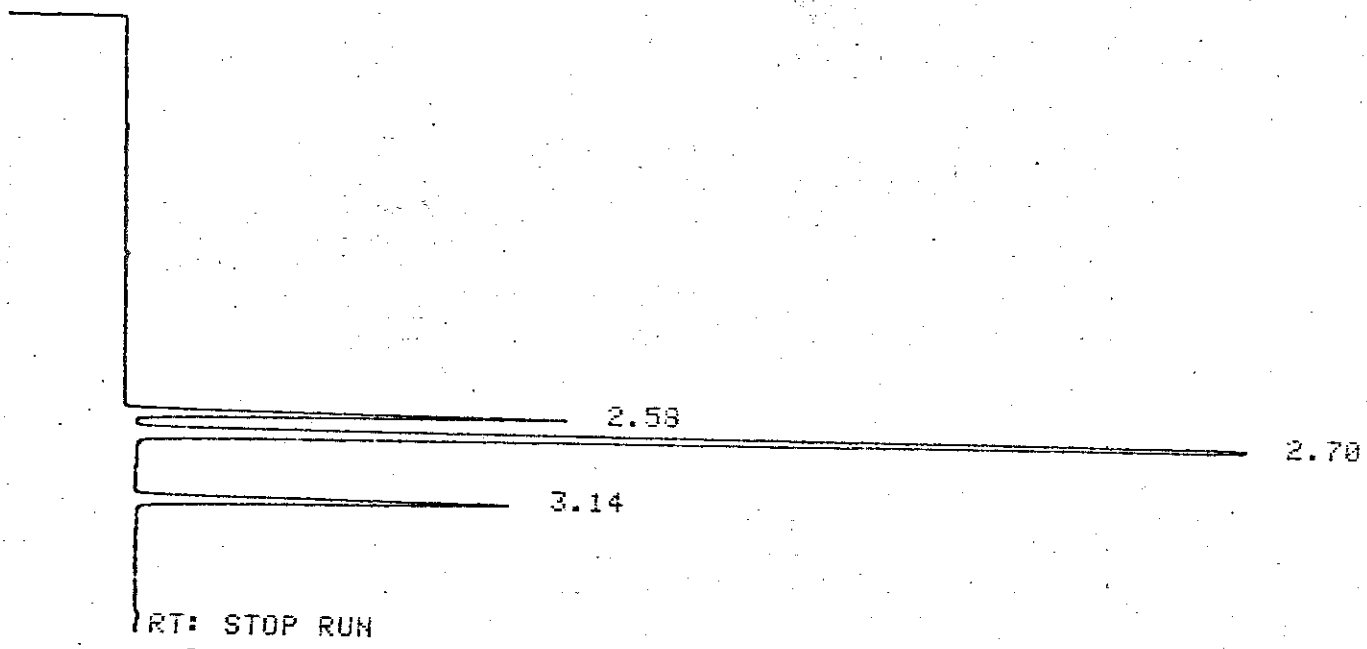
Figure II



ATTN 2↑E
LIST ATTN 2↑
ATTN = 2↑6

ATTN 2↑4

START AUTO SEQ 1, 1

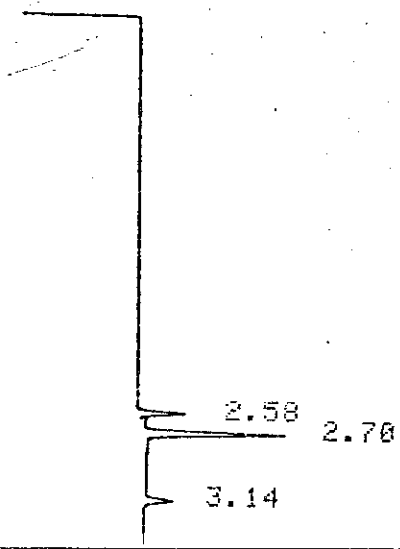


[hp] 5880A SAMPLER INJECTION @ 15:37 FEB 20, 1984
SAMPLE # : ID CODE :
1 XYLENE STD
AREA %

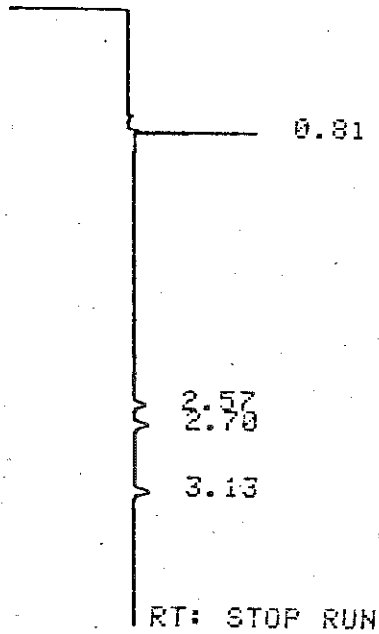
RT	AREA	TYPE	AREA %
2.58	169.10	BV	16.325
2.70	683.35	VB	65.974
3.14	183.34	BB	17.700

TOTAL AREA = 1035.79
MULTIPLIER = 1

START AUTO SEQ 2, 2



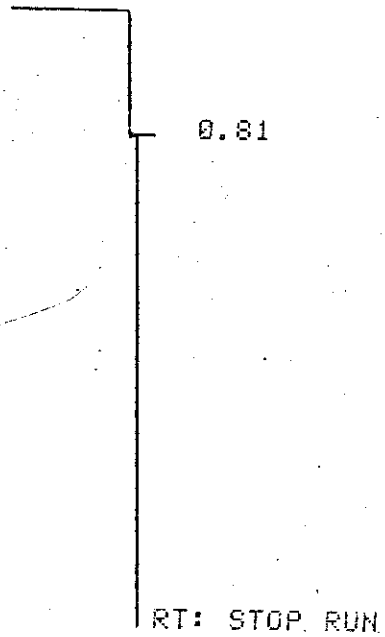
START AUTO SEQ 3, 7



[hp] 5880A SAMPLER INJECTION @ 16:19 FEB 20, 1984
SAMPLE # : ID CODE :
3 A-1
AREA %

RT	AREA	TYPE	AREA %
0.81	12.40	BB	40.231
2.57	4.82	BB	15.642
2.70	6.48	BB	21.020
3.13	7.12	BB	23.108

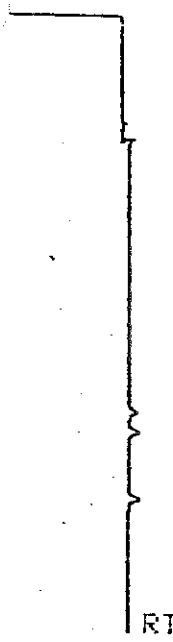
TOTAL AREA = 30.81
MULTIPLIER = 1



[hp] 5880A SAMPLER INJECTION @ 16:24 FEB 20, 1984
SAMPLE # : ID CODE :
4 BLANK
AREA %

RT	AREA	TYPE	AREA %
0.81	2.42	BB	100.000

TOTAL AREA = 2.42
MULTIPLIER = 1

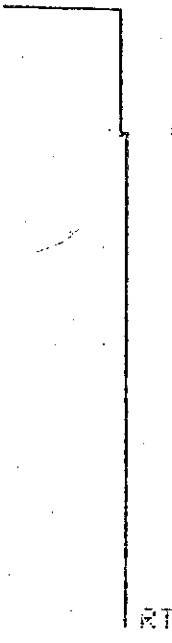


[hp] 5880A SAMPLER INJECTION @ 16:30 FEB 20, 1984
SAMPLE # : 5 ID CODE : A-2

AREA %

RT	AREA	TYPE	AREA %
0.81	1.08	BB	17.857
3.14	4.96	BB	82.143

TOTAL AREA = 6.04
MULTIPLIER = 1

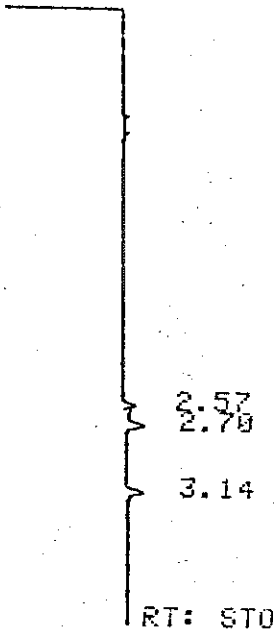


[hp] 5880A SAMPLER INJECTION @ 16:35 FEB 20, 1984
SAMPLE # : ID CODE :

AREA %

RT	AREA	TYPE	AREA %
0.91	0.96	BB	100.000

TOTAL AREA = 0.96
MULTIPLIER = 1



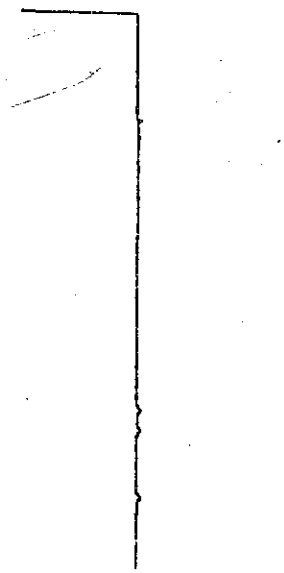
RT: STOP RUN

[hp] 5880A SAMPLER INJECTION @ 16:41 FEB 20, 1984
SAMPLE # : ID CODE :
7 A-3
AREA %

RT	AREA	TYPE	AREA %
2.57	5.16	BB	25.364
2.70	7.13	BB	35.026
3.14	8.06	BB	39.610

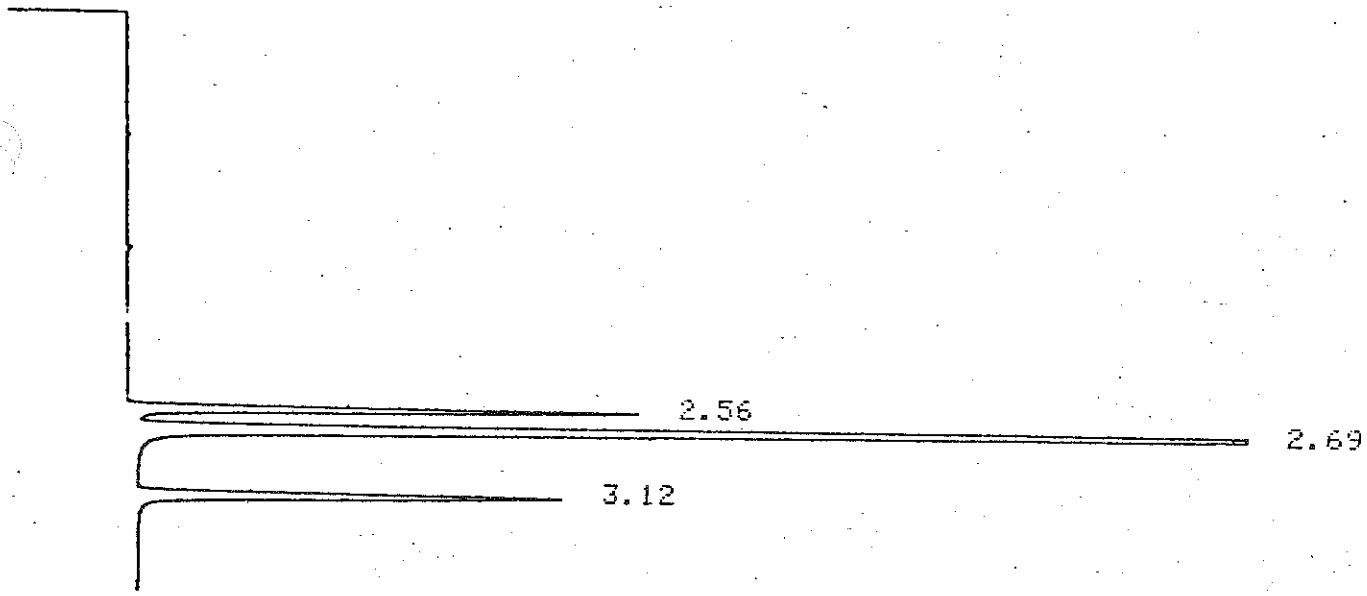
TOTAL AREA = 20.35
MULTIPLIER = 1

START AUTO SEQ 7, 7



split

START AUTO SEQ 1, 1

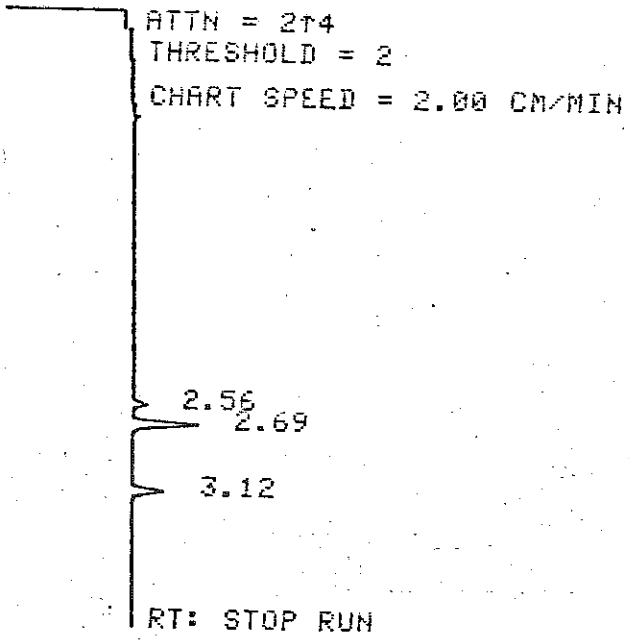


[hP] 5880A SAMPLER INJECTION @ 15:25 FEB 22, 1984
SAMPLE # : ID CODE :
1 XYLENE STD
AREA %

RT	AREA	TYPE	AREA %
2.56	216.04	BV	16.648
2.69	862.04	VB	66.426
3.12	219.67	BB	16.927

TOTAL AREA = 1297.75
MULTIPLIER = 1

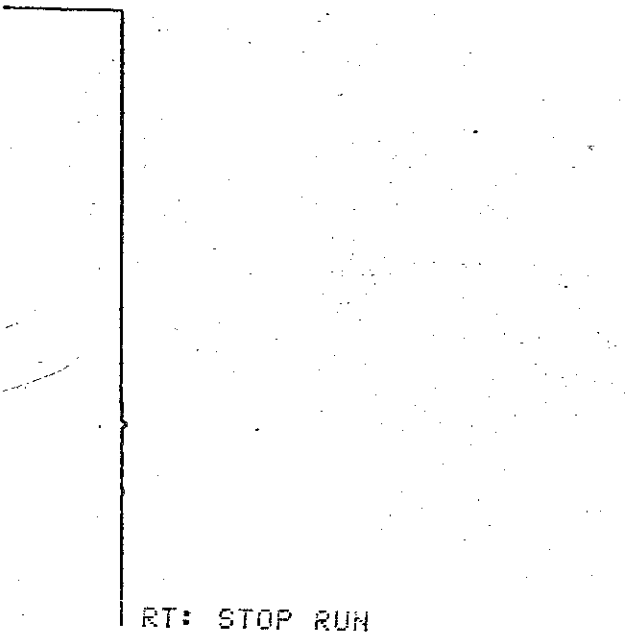
START AUTO SEQ 3, 8



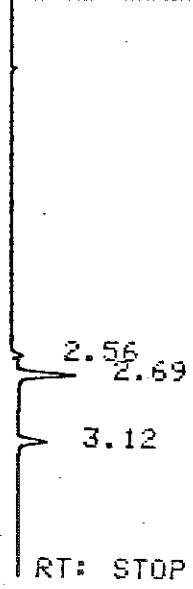
[hp] 5880A SAMPLER INJECTION @ 15:54 FEB 22, 1984
SAMPLE # : ID CODE :
3 B-1
AREA %

RT	AREA	TYPE	AREA %
2.56	5.11	BB	9.866
2.69	31.56	BB	60.896
3.12	15.15	BB	29.237

TOTAL AREA = 51.83
MULTIPLIER = 1



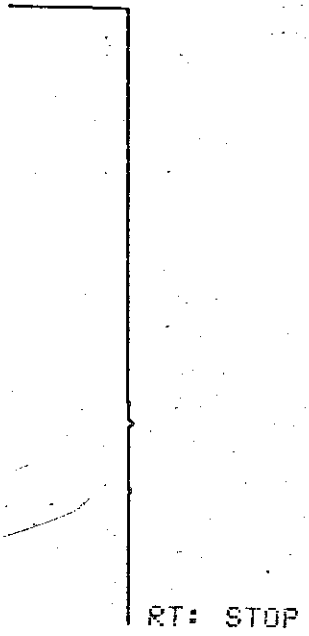
[hp] 5880A SAMPLER INJECTION @ 15:59 FEB 22, 1984
SAMPLE # : ID CODE :
4 BLANK
NO PEAKS



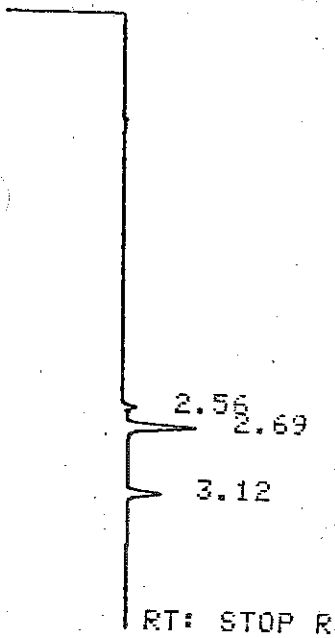
[hp] 5880A SAMPLER INJECTION @ 16:05 FEB 22, 1984
SAMPLE # : ID CODE :
5 B-2
AREA %

RT	AREA	TYPE	AREA %
2.56	4.42	BB	9.885
2.69	27.14	BB	60.752
3.12	13.12	BB	29.364

TOTAL AREA = 44.68
MULTIPLIER = 1



[hp] 5880A SAMPLER INJECTION @ 16:10 FEB 22, 1984
SAMPLE # : ID CODE :
6 BLANK
NO PEAKS



[hp] 5880A SAMPLER INJECTION @ 16:16 FEB 22, 1984
SAMPLE # : ID CODE :
7 B-3
AREA %

RT	AREA	TYPE	AREA %
2.56	5.20	BB	9.792
2.69	32.24	BB	60.667
3.12	15.70	BB	29.541

TOTAL AREA = 53.14
MULTIPLIER = 1

STOP AUTO SEQ

```
LIST CHART SPEED
CHART SPEED = 2.00 CM/MIN

LIST ATTN 2↑
 TTN = 2↑4

LIST THRESHOLD
THRESHOLD = 2
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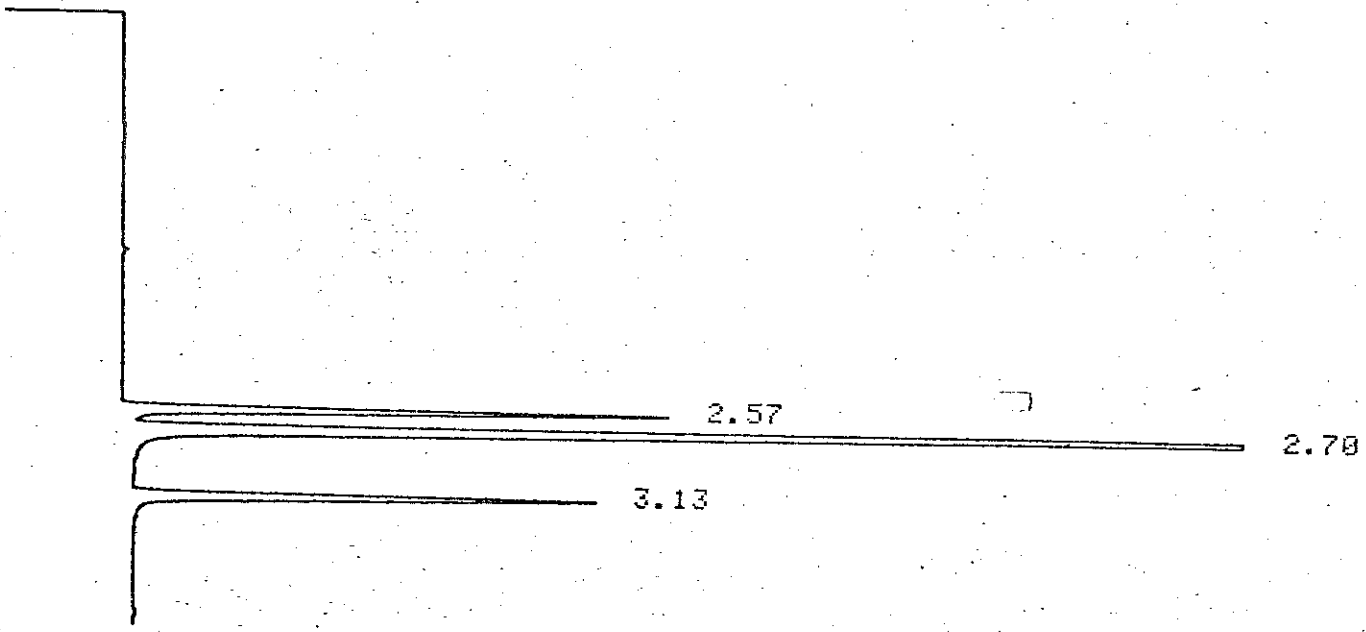


```
[hp] 5880A  SAMPLER INJECTION @ 13:32  FEB 24, 1984
  SAMPLE # :  ID CODE  :
           1  XYLENE STD
AREA %
```

RT	AREA	TYPE	AREA %
2.57	232.17	BV	16.547
2.70	931.49	VB	66.389
3.13	239.41	BB	17.064

```
TOTAL AREA = 1403.07
MULTIPLIER = 1

START AUTO SEQ 2, 2
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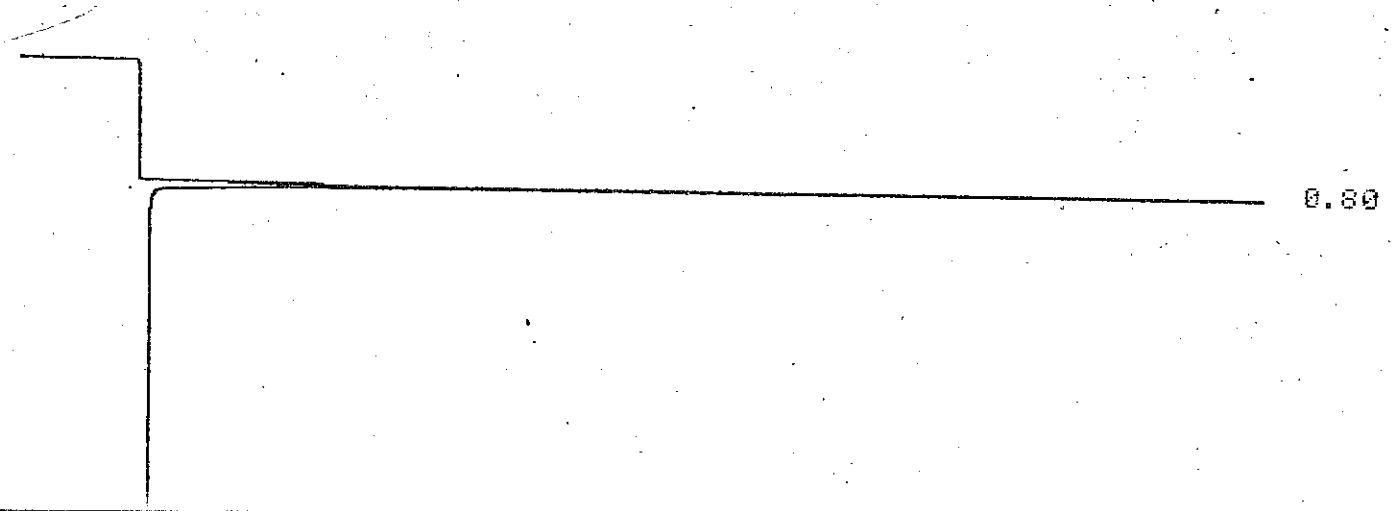
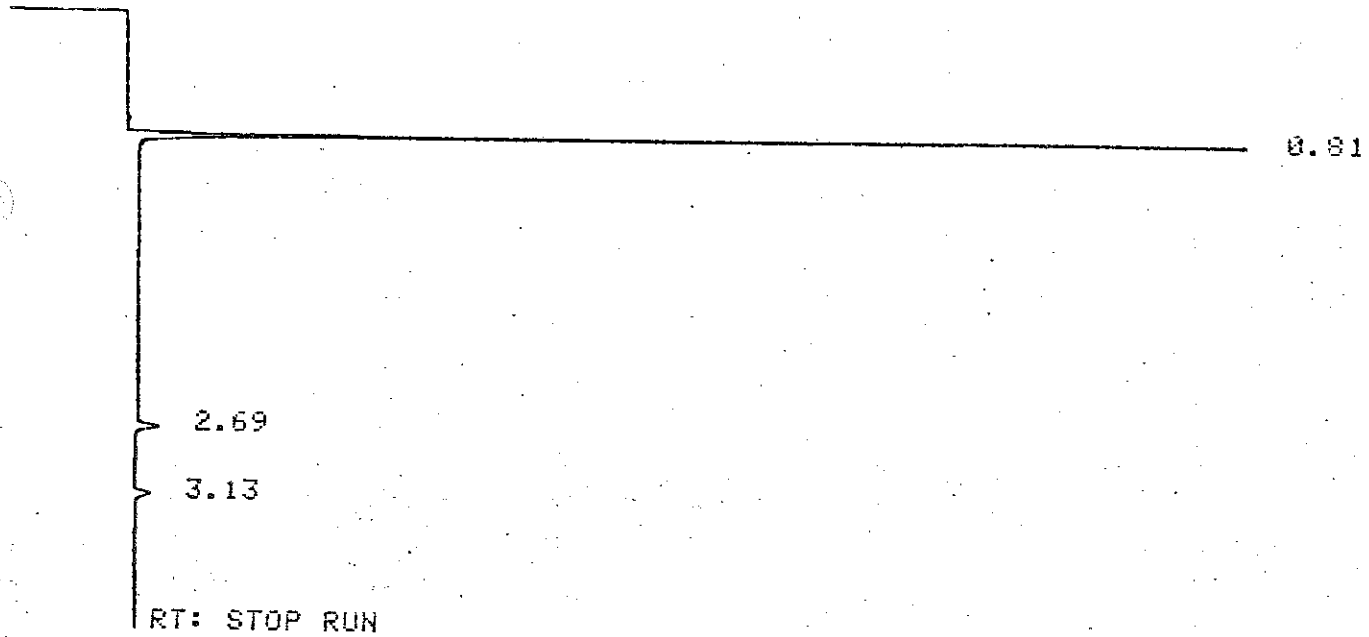
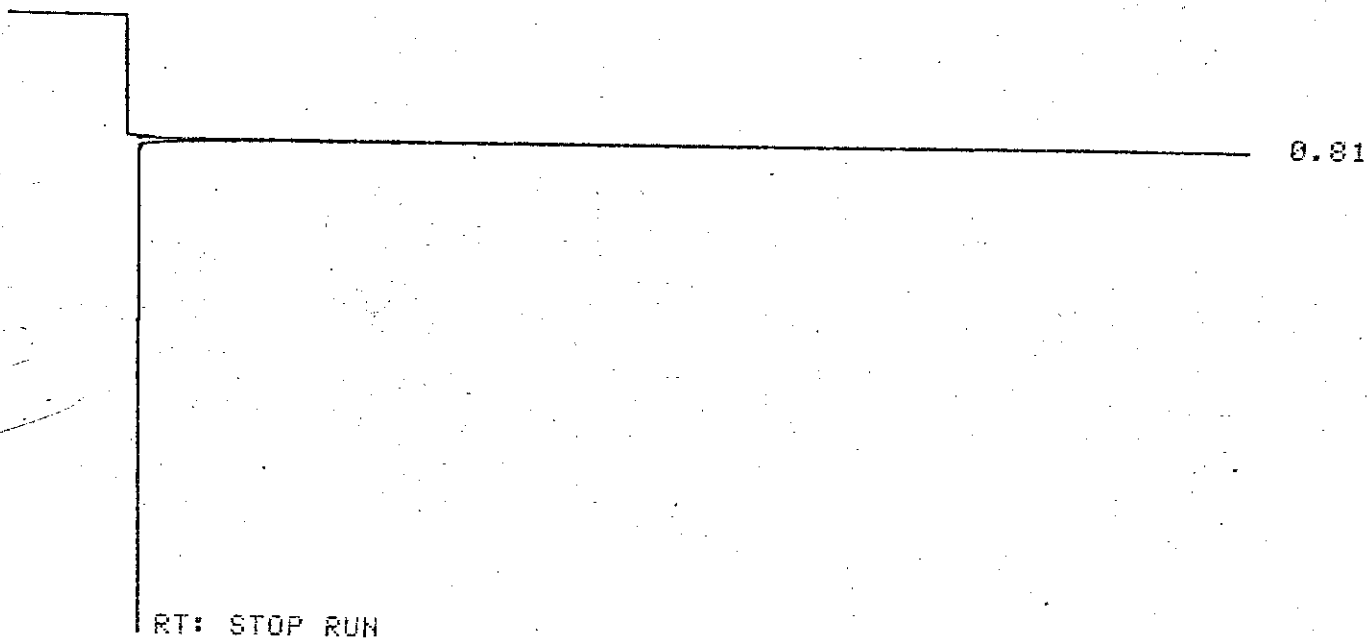




[hP] 5880A SAMPLER INJECTION @ 13:44 FEB 24, 1984
SAMPLE # : ID CODE :
3 C-1
AREA %

RT	AREA	TYPE	AREA %
0.81	430.11	BB	96.171
2.69	9.65	BB	2.157
3.13	7.48	BB	1.672

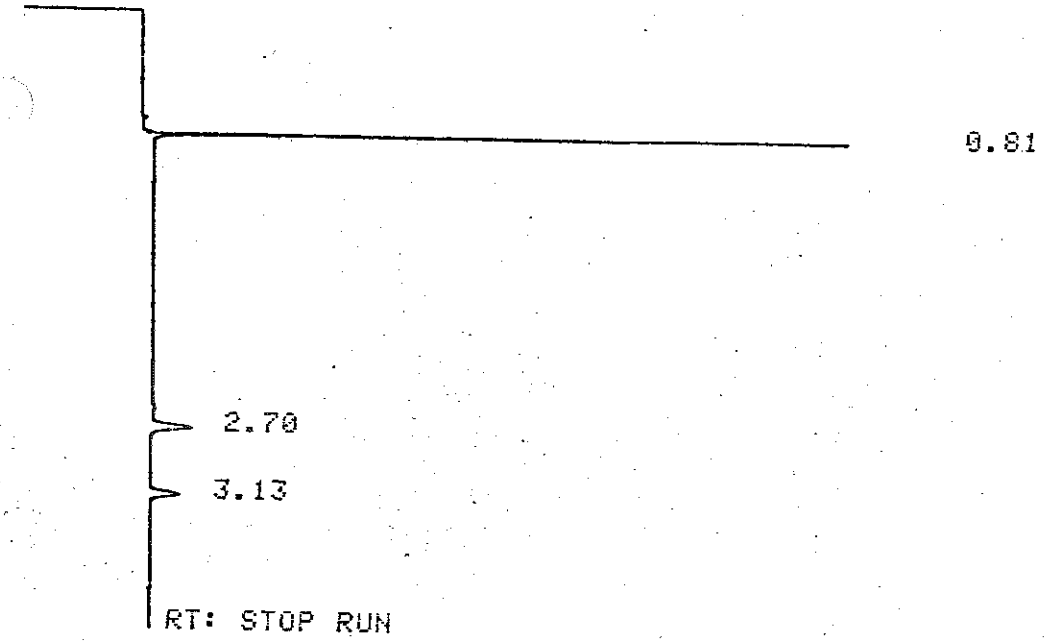
TOTAL AREA = 447.23
MULTIPLIER = 1



[hP] 5880A SAMPLER INJECTION @ 13:49 FEB 24, 1984
SAMPLE # : ID CODE :
4 BLANK
AREA %

RT	AREA	TYPE	AREA %

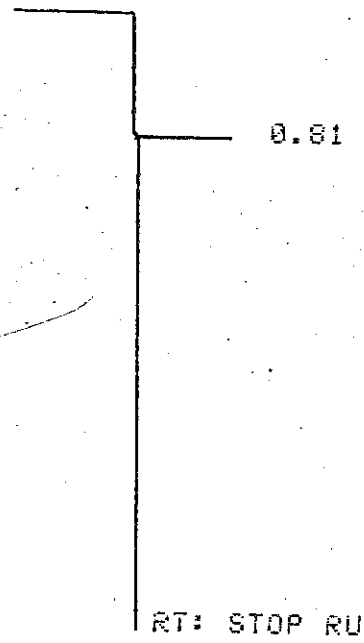
TOTAL AREA = 209.41
MULTIPLIER = 1



[hp] 5880A SAMPLER INJECTION @ 13:55 FEB 24, 1984
SAMPLE # : ID CODE :
5 C-2
AREA %

RT	AREA	TYPE	AREA %
0.81	60.75	BB	64.273
2.70	19.32	BB	20.444
3.13	14.45	BB	15.283

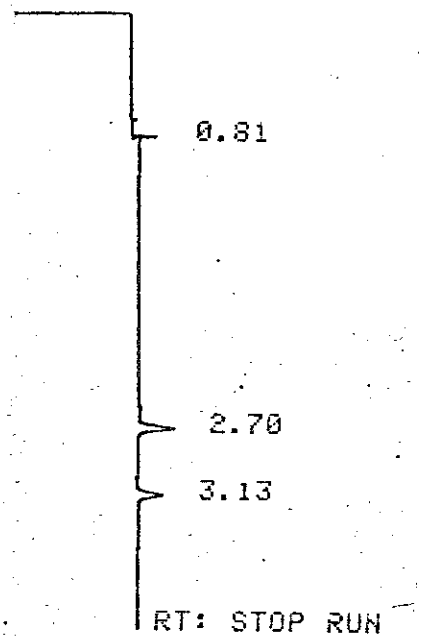
TOTAL AREA = 94.52
MULTIPLIER = 1



[hp] 5880A SAMPLER INJECTION @ 14:01 FEB 24, 1984
SAMPLE # : ID CODE :
6 BLANK
AREA %

0.81	9.17	BB	100.000

TOTAL AREA = 9.17
MULTIPLIER = 1

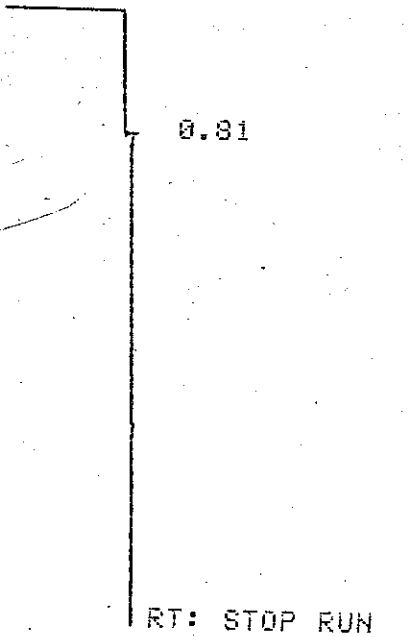


[hp] 5880A SAMPLER INJECTION @ 14:06 FEB 24, 1984
SAMPLE # : ID CODE :
7 C-3

AREA %

RT	AREA	TYPE	AREA %
0.81	2.40	BB	7.922
2.70	16.16	BB	53.247
3.13	11.79	BB	38.831

TOTAL AREA = 30.36
MULTIPLIER = 1



[hp] 5880A SAMPLER INJECTION @ 14:19 FEB 24, 1984

Timber and Wood Products Group

Boise Cascade

Insulite Manufacturing
International Falls, Minnesota 56649
(218) 285-5011

April 20, 1984

William H. Miner
Chief, Technical Permits
& Compliance Section
U.S. EPA Region V
230 South Dearborn Street
Chicago, IL 60604

Re: Insulite Division Closure Plan

U.S. EPA ID No.: MND 980 700 884 G, PA, 9

Dear Sir:

In response to your letter dated April 9, 1984, please find attached the requested ammendments to our previously submitted closure plan. The contents of the ammendment are based on my phone conversation with Mr. Ken Chiu of your office on April 18, 1984.

Sincerely,

BOISE CASCADE CORPORATION

R. G. Leen
Environmental Specialist

Attachment

RGL/bjp

cc: Ken Chiu - EPA
Ken Skahn - EPA
Greg Pederson - MPCA
George Prachnofski

Subject: Ammendment to Facility Closure Plan

Facility: Boise Cascade
Hardboard Products Division (Insulite)
International Falls, MN
EPA ID No: MND 980 700 884

Dated: April 18, 1984

The Closure Plan is ammended to read as follows:

I. Additions

A. Decontamination Procedure: Upon closure of facility all equipment used and storage area will be washed down with sufficient volumes of water to render them non-hazardous.

B. Final Closure Schedule

1. Barrel segregation will be done on weather-permitting basis starting April 30, 1984 with estimated time of 36 days/576 man-hours.

2. Testing of suspect drums will be done immediately following barrel segregation with estimated time of 10 days/160 man-hours.

3. Packaging, loading, and transporting off site to disposal facility is estimated to be completed by September 1, 1984.

II. Deletion

A. EPA Hazardous Waste Classification No. F003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: May 24, 1984

SUBJECT: Closure Plan for Boise Cascade Corporation
Hardboard Products Division
International Falls, MN
EPA ID NO. MND 980700884

FROM: for Daniel J. Banaszek, Chief Kenneth Skeh
State Technical Unit # 2

TO: Judy Kertcher, Chief
Regulatory Analysis and Information unit

Attached is the closure plan for the above named facility. The plan has been reviewed by Minnesota Pollution Control Agency for technical adequacy. It is requested that your staff prepare and issue a public notice per 40 CFR 265.112 (d).

Please inform Ken Chiu of my staff at 6-6193 when the public notice has been issued and advise him of any comments received at the end of the comment period.

Attachment

cc. Part A file
Ken Chiu

CLOSURE PLAN

BOISE CASCADE CORPORATION
U.S. EPA FACILITY ID NO.: MND 980700884

Facility: Boise Cascade Corporation
Hardboard Manufacturing Division
2nd Street
International Falls, Minnesota 56649

EPA I.D. MND 980700884

I. Description of Waste:

A. EPA Hazardous Waste No: D001

B. Waste type and description:

Waste is being stored in 55 gallon barrels and consists of spent xylene, dried paint, and clean-up material (polyethylene drop-cloths, absorbent material and rags from industrial painting of siding products). The volume of free liquid in the barrels is estimated at 5 gallons average.

C. Estimated amount of hazardous wastes: 15000 lbs.

There are approximately 100 barrels of solvent based paint wastes commingled with 3300 barrels of water based paint wastes.

II. Estimated closure costs: $37,000

III. Final Closure Schedule

1. Barrel segregation will be done on weather-permitting basis starting April 30, 1984 with estimated time of 36 days/576 man-hours.

2. Testing of suspect drums will be done immediately following barrel segregation with estimated time of 10 days/160 man-hours.

3. Packaging, loading, and transporting off site to disposal facility is estimated to be completed by September 1, 1984.

IV. Closure Procedure:

A. Outline of plan - Figure 1

B. Description of plan

1. Step I - Segregation by Date Codes

Two types of date information are available on the barrels. (1) DOT tested date and, (2) paint manufacturers date. All barrels that have confirmed dates prior to February 15, 1981 and barrels where dates cannot be confirmed, will be analyzed for solvent content. February 14, 1981 is the last day solvent based paints were used in coating operation.

2. Step II - Analyze for Xylene

II-A. Initial screening of barrels suspected of containing xylene (based on date codes) will be acomplished with the MSA Combustible Gas Indicator Model 40. Readings of less than 60 on meter (60% of LEL) will pose no significant environmental effect as the barrels will contain minimal amounts of xylene (< 200 cc). The graph in Fig. II was determined by selecting a barrel of waste with an original MSA reading close to zero (.4). Incremental additions of xylene were placed in the barrel and corresponding MSA readings taken. After each increment the barrel was sealed for a minmum of 48 hours to allow equilibrium to be reached in headspace. The MSA readings were taken by removing the bung from the top of the barrel and inserting sample line.

II-B. Barrels with MSA readings greater than 60 will be sampled and analyzed to confirm presence of xylene. A one (1) ml sample vial is placed through bung opening and held for two minutes, withdrawn, and capped immediatley with seal and septa. Sample is then analyzed for xylene on a Hewlett Packard 5880A Gas Chromatograph. (See attached chromatograms). A DB-5 30 meter, wide bore, capillary column is is used. Injector temperature of 250°C and detector temperature of 350°C. The run is made isothermally at 50°C. No attempt to quantify amount of xylene was made made. Any barrels confirmed as containing xylene will be treated as a harzardous waste. Testing shows that 10cc of xylene placed in a barrel can be detected (sample (A) chromatograms) by this method.

3. Step III - Hazardous Waste Disposal

All barrels confirmed as containing significant amounts of xylene will be treated as hazardous waste. Barrels will be inspected for integrity and over packs used where necessary. Wastes will be transported and disposed of by EPA permitted companies. These companies will be determined when we know the extent of the wastes to be disposed.

4. Step IV - Non-hazardous Wastes Disposal

Wastes determined to contain non-hazardous material will be disposed of by method previously approved by MPCA for water based paint wastes.

5. Step V - Decontamination Procedure

A. Upon closure of facility, all equipment used in closure and storage area will be washed down with sufficient volumes of water to render them non-hazardous.

B. Spills resulting during handling of drums that may contain hazardous wastes will be contained and cleaned up with sufficient amount of absorbant material. The resulting spill residue/absorbant material mixture will be placed in secure drums and tested for solvent content according to procedure outlined in closure plan.

Figure I

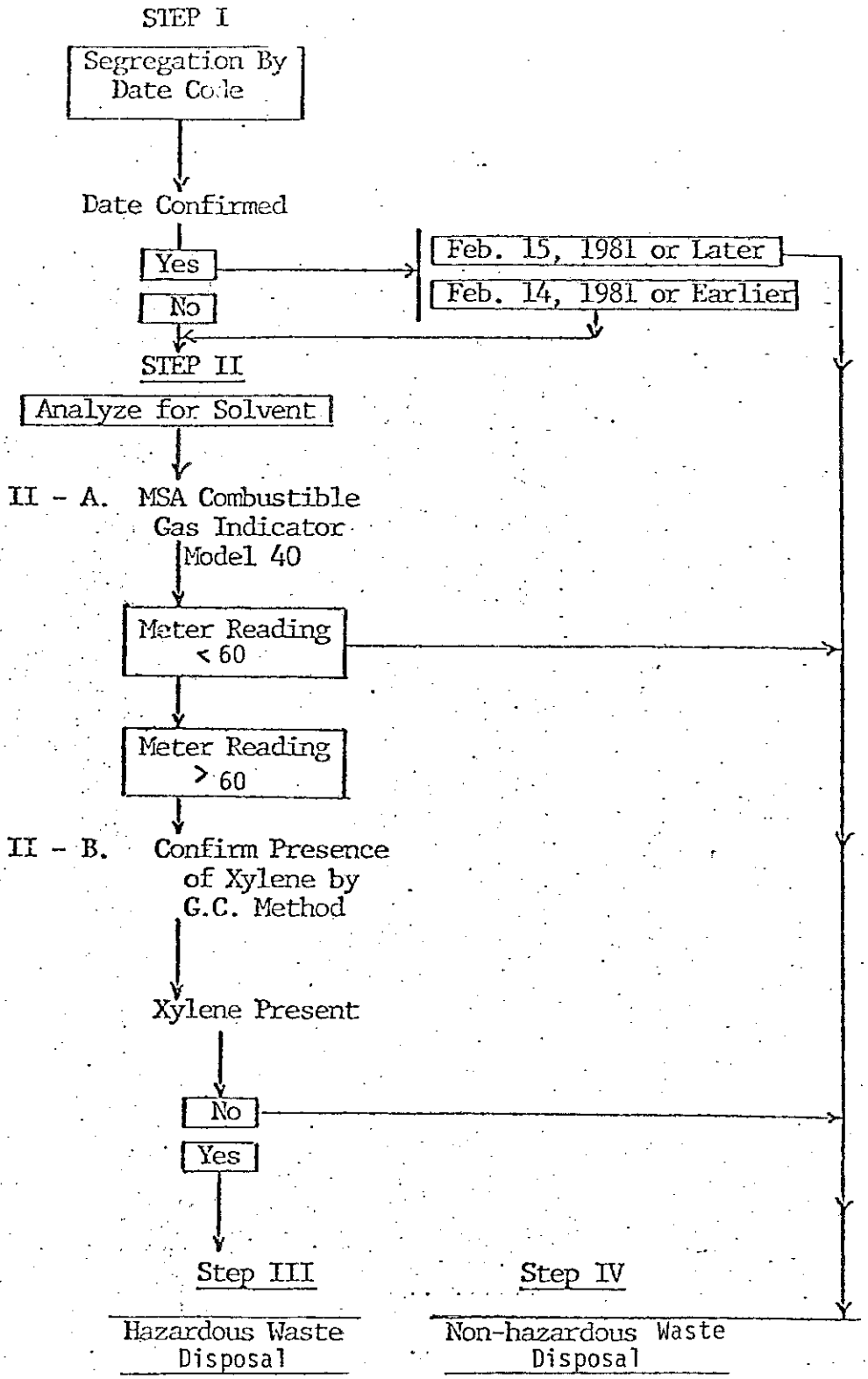
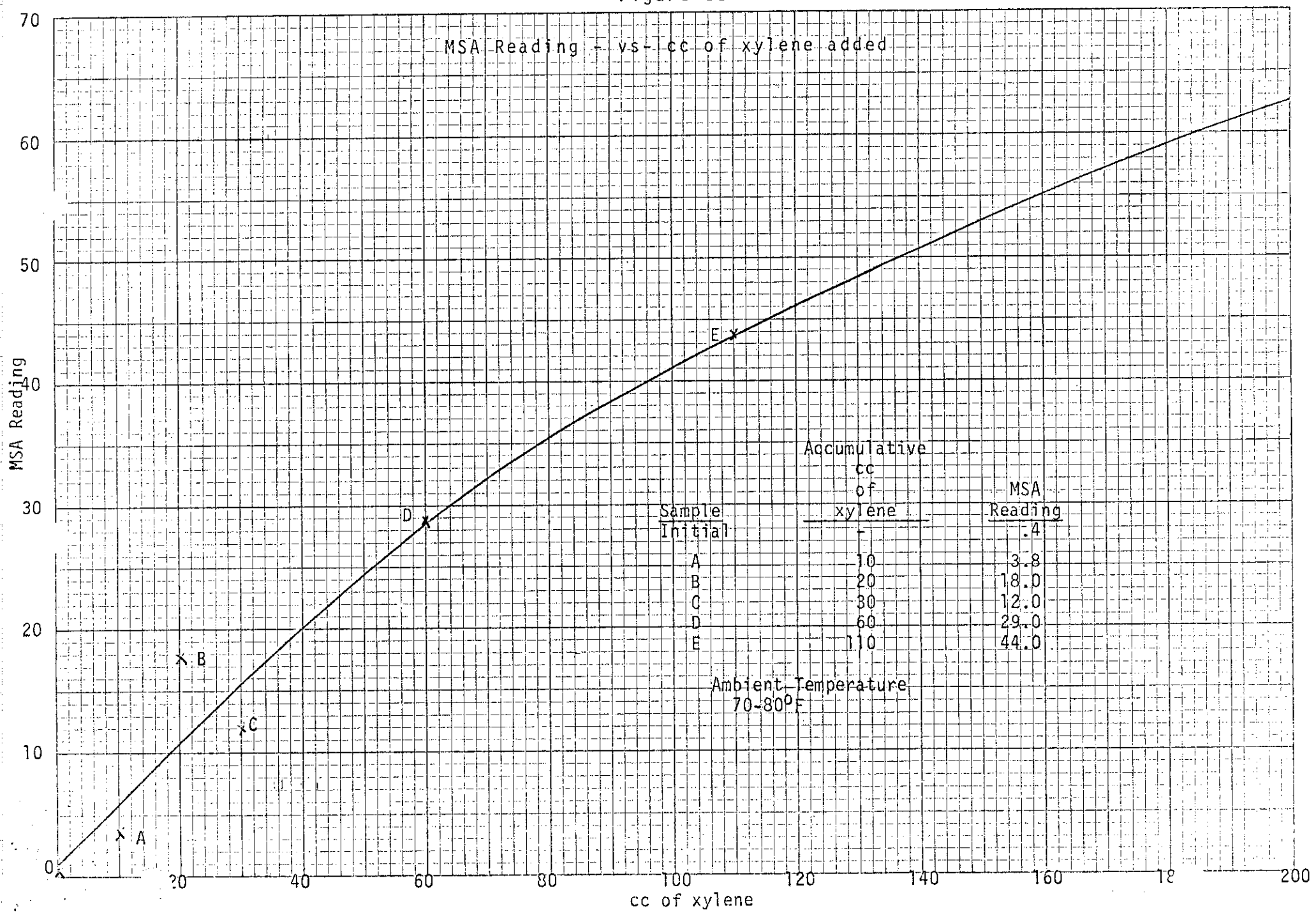

STEP I
Segregation By Date Code
Date Confirmed
Yes
No
Feb. 15, 1981 or Later
Feb. 14, 1981 or Earlier
STEP II
Analyze for Solvent
II - A. MSA Combustible Gas Indicator Model 40
Meter Reading < 60
Meter Reading > 60
II - B. Confirm Presence of Xylene by G.C. Method
Xylene Present
No
Yes
Step III
Hazardous Waste Disposal
Step IV
Non-hazardous Waste Disposal

Figure II



Sample Initial	Accumulative cc of xylene	MSA Reading
-	-	.4
A	10	3.8
B	20	18.0
C	30	12.0
D	60	29.0
E	110	44.0

Ambient Temperature 70-80°F

Timber and Wood Products Group

Boise Cascade

Insulite Manufacturing
International Falls, Minnesota 56649
(218) 285-5011

May 14, 1984

Mr. George Pruchnofski
Minnesota Pollution Control Agency
Division of Solid Hazardous Waste
1935 West County Road B-2
Roseville, MN 55113

Re: Paint Waste Closure Plan

Dear George:

This is in response to your request for additional decontamination procedures per our phone conversation of May 11, 1984. Please find attached a copy of closure plan amendment addressing required procedure.

It is my understanding this will complete the necessary requirements for formal publication of closure plan. Please respond with written confirmation.

Sincerely,

BOISE CASCADE CORPORATION

Ron Leen

Ron Leen
Environmental Specialist

RL/bjp

Attachment

cc: Greg Pederson - MPCA
Ken Chiu - EPA

Subject: Ammendment to Facility Closure Plan

Facility: Boise Cascade
Hardboard Products Division (Insulite)
International Falls, MN 56649
EPA ID No: MND 980 700 884

Dated: May 14, 1984

The Closure Plan is ammended to read:

I. Additions

A. Decontamination Procedure: Spills resulting during handling of drums that may contain hazardous wastes will be contained and cleaned up with sufficient amount of absorbant material. The resulting spill residue/absorbant material mixture will be placed in secure drums and tested for solvent content according to procedures outlined in closure plan.

Subject: Ammendment to Facility Closure Plan

Facility: Boise Cascade
Hardboard Products Division (Insulite)
International Falls, MN
EPA ID No: MND 980 700 884

Dated: April 18, 1984

The Closure Plan is ammended to read as follows:

I. Additions

A. Decontamination Procedure: Upon closure of facility all equipment used and storage area will be washed down with sufficient volumes of water to render them non-hazardous.

B. Final Closure Schedule

1. Barrel segregation will be done on weather-permitting basis starting April 30, 1984 with estimated time of 36 days/576 man-hours.

2. Testing of suspect drums will be done immediately following barrel segregation with estimated time of 10 days/160 man-hours.

3. Packaging, loading, and transporting off site to disposal facility is estimated to be completed by September 1, 1984.

II. Deletion

A. EPA Hazardous Waste Classification No. F003

Timber and Wood Products Group

Insulite Manufacturing
International Falls, Minnesota 56649
(218) 285-5011

Boise Cascade

3609

May 7, 1984

Darryl Weakly
Minnesota Pollution Control Agency
Division of Water Quality
1935 West County Road B-2
Roseville, Minnesota 55113

Dear Darryl:

This is in response to your letter dated April 25, 1984 requesting additional information concerning the possibility of layering occurring in the paint wastes.

Given the fact that the barrels of waste were generated on a daily basis, any liquid wastes placed into the barrel would not have sufficient time to form a layer capable of supporting the weight of the next wastes placed into the barrel. Any separation or layering that could occur would be the settling of any solid to the bottom with the liquid on the surface. Any hardening of the wastes would have to involve the absence of any solvent and would not exhibit the characteristic of ignitability.

Based on this information, sufficient layering in the barrels, to cause non-detection of significant quantities of solvent with the CGI, would not occur.

If you have further questions, please contact me at (218)285-5351.

Sincerely,

BOISE CASCADE CORPORATION

Ron Leen

Ron Leen
Environmental Specialist

RL/bjp
cc: R. Dell, EPA
J. Pegors, MPCA

APR 9 1984

Mr. Ronald C. Lean
Boise Cascade Corporation
Wallboard Manufacturing Division
400 West 2nd Street
International Falls, Minnesota 56649

RE: Insulite Division
Closure Plan

U.S. EPA ID No.: MND 980 704 984

Dear Mr. Lean:

Your closure plan for the drum storage facility at Insulite Division has been received. Upon review of the plan, we have determined it to be incomplete when compared with 40 CFR 265 Subpart G requirements. The following requirements have not been addressed:

(1) Steps needed to decontaminate storage facility area and equipment; and
(2) A schedule for final closure of the drum storage area.

Please revise your plan to include the above requirements. Enclosed is a copy of 40 CFR 265 Subpart G to help you in revising the closure plan.

According to the information you have provided, the Insulite Division will not be a generator of hazardous waste after closure of the drum storage area in midsummer of this year. Therefore, after closure performance, certification and regulatory approval, the Insulite Division will not be subject to storage facility or generator requirements. Since the company will no longer be a federally regulated generator of hazardous waste after closure, the company will not be required to develop a personnel training program or a contingency plan. All other 40 CFR 265 standards, as well as applicable state requirements, must be complied with.

Upon receipt of an acceptable closure plan, we will publicly notice the plan. After completion of the thirty (30) days public notice period, we will notify you in writing of our decision to approve, modify or disapprove the plan. If the closure plan is approved, you may proceed to close the storage facility as outlined in the plan.

Please contact Ken Skahn at (312) 886-6198 or Ken Chin at (312) 886-6193 if you have any questions.

Sincerely,

ORIGINAL SIGNED BY
WILLIAM H. MINER

William H. Miner, Chief
Technical Permits & Compliance Section

Enclosure: 40 CFR 262 Subpart C

cc: Greg Pedersen, MPCA
bcc: Ken Skahn, U.S. EPA

5HW-13:K. Chin:G. Words:4/3/84

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	G.W.	KC		for Ken Skahn		[illegible]		
DATE	4/4/84	4/4/84				4/5/84		

Timber and Wood Products Group

Boise Cascade

Insulite Manufacturing
International Falls, Minnesota 56649
(218) 285-5011

March 14, 1984

Ken Skahn
EPA Region V
RCRA Activities
Box A3587
Chicago, IL 60690-3587

EPA I.D. No: MND 980-700-884 G, PA-9

Dear Ken:

This letter is in response to our telephone conversation of March 13, 1984. Attached is a copy of the closure plan for our paint wastes. A copy was given to Darryl Weakly of the Minnesota Pollution Control Agency on March 9, 1984. Per our conversation, written relief from interim status requirements of 40 CFR Part 265 (excluding subpart G, H and I) is requested. This request is based on the fact that once the paint wastes are disposed of according to the closure plan in mid 1984 we will no longer be a handler of hazardous wastes and will be submitting a request for withdrawal of our Part A application. If you have further questions, please contact me at (218) 285-5351. A prompt response will be greatly appreciated.

Sincerely,

BOISE CASCADE CORPORATION

Ron Leen

Ron Leen
Environmental Specialist

RL/bjp

Attachment

cc: Greg Pederson - MPCA

612 - 296-7278

Part A File

Minnesota Pollution Control Agency

July 16, 1984

Mr. Ronald G. Leem
Boise Cascade Corporation
Insulite Manufacturing
International Falls, Minnesota 56649

MND 980-700-984

Dear Mr. Leem:

RE: RCRA (& State) Financial Requirements
Boise Cascade Corporation

The Minnesota Pollution Control Agency (MPCA) is cooperating with the U.S. Environmental Protection Agency (EPA), Region V, in carrying out the provisions of the Resource Conservation and Recovery Act (RCRA). In this effort, the MPCA personnel are providing review of the RCRA financial requirements for facilities located in Minnesota. The MPCA review relates only to facilities located in Minnesota.

The yearly updated information provided to support use of the financial test for closure and post-closure costs and liability requirements has been reviewed. This information includes your letter to the EPA dated March 28, 1984, with an attached letter to the EPA from Mr. John Fery, dated March 26, 1984 and a second attached letter to Boise Cascade Corporation from Arthur Anderson and Company dated March 26, 1984.

Based upon our review we have the following comments:

1. 40 CFR 264.143(f) requires that in addition to the information identified above, submittal of the independent certified accountant's report on examination of the owner or operator's financial statements for the latest completed fiscal year is required. This information has not been received. Please provide a copy of the report.

2. In regard to the bond used to meet the financial requirements, please define what bond issue this is.

Phone: 612/296-7278
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

Other than for the above comments, the information appears to be satisfactory. It is requested that the additional information be provided within 30 days. Once the information is provided, our review of the financial requirements wil continue. In the meantime, if you have any comments regarding this matter, please feel free to contact George Pruchnofski of my staff at 612/296-7266.

Sincerely,

Steven A Reed

Steven A. Reed, Supervisor
Hazardous Waste Permit and Review Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

SAR/GJP:ch

cc: Mr. Tom Gulz, EPA, Chicago
Mr. Ken Skahn, EPA, Chicago
Mr. Richard Dell, EPA, Chicago

General Offices

Legal Department
One Jefferson Square
Boise, Idaho 83728

Boise Cascade Corporation

March 28, 1984

Certified Mail
Return Receipt Requested

Environmental Protection Agency
RCRA Activities
Attention William H. Miner
Region V
P.O. Box A-3587
Chicago, IL 60690

Subject: Boise Cascade Corporation (EPA ID No. MND-980-700-884) -- RCRA Financial Requirements for International Falls, Minnesota, Facility

Ladies and Gentlemen:

Enclosed are letters from Boise Cascade's chief executive officer and the company's independent auditors in response to your January 31, 1984, request to provide evidence of meeting the financial requirements of the Resource Conservation and Recovery Act (RCRA).

Currently, Boise Cascade's Insulite hardboard plant is storing a small amount of hazardous paint waste. As explained in previous letters to EPA, Boise Cascade has never transported or disposed of hazardous waste. The company has planned for proper disposal of the stored hazardous paint waste by midsummer 1984.

Closure plans describing the procedures to be used in disposing of this paint waste were sent to the Minnesota Pollution Control Agency (MPCA) and Ken Skahn of EPA Region V during the first two weeks of March 1984.

It is the intent of Boise Cascade to continue to work closely with both the MPCA and the EPA toward the proper disposal of this hazardous paint waste.

Please feel free to call me at (218) 285-5351 if you have any questions.

Sincerely,

Ronald G. Leen

Ronald G. Leen
Environmental Specialist

RGL/JAK/fmb

cc: Rod Massey, MPCA
Greg Pederson, MPCA
Ken Skahn, EPA

ARTHUR ANDERSEN & CO.

999 MAIN STREET
BOISE, IDAHO 83702
(208) 345-0937

To Boise Cascade Corporation:

We, as independent public accountants, have examined the financial statements of Boise Cascade Corporation and its subsidiaries as of December 31, 1983, and for the year then ended and have issued our report thereon dated January 30, 1984. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We have read the letter from John B. Fery, addressed to the Environmental Protection Agency and dated March 26, 1984, relating to the Company's compliance with RCRA financial requirements. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 C.F.R. Parts 264 and 265.

In our opinion the data reported in items 7, 8 and 11 of Part B in the above described letter has been derived from the financial statements referred to above and nothing has came to our attention that caused us to believe such data should be adjusted.

Arthur Andersen & Co.

Boise, Idaho,
March 26, 1984.

One Jefferson Square
Boise, Idaho 83728
208/384-7560

John B. Fery
Chairman of the Board
Chief Executive Officer

Boise Cascade Corporation

March 26, 1984

Environmental Protection Agency
RCRA Activities
Region V
P.O. Box A-3587
Chicago, IL 60690

Subject: Boise Cascade Corporation -- RCRA Financial Requirements for International Falls, Minnesota, Facility

Dear Madam or Sir:

I am the chief executive officer of Boise Cascade Corporation and as such act as the chief financial officer. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 C.F.R. Parts 264 and 265.

Boise Cascade Corporation is the owner and operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 C.F.R. Parts 264 and 265:

Facility	EPA ID No.
Region V Boise Cascade Corporation Insulite Manufacturing Second Street International Falls, MN 56649	MND-980-700-884
National Pole and Treating Site Medtronic Parcel Fridley, Minnesota	--

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 C.F.R Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

Facility Region V	EPA ID No.	Costs Closure	Costs Post-Closure
Boise Cascade Corporation Insulite Manufacturing Second Street International Falls Minnesota	MND-980-700-884	$37,000	0

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 C.F.R. Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility.

None

3. In states where EPA is not administering the financial requirements of Subpart H of 40 C.F.R. Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 C.F.R. Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility.

None

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure, or if a disposal facility, post-closure care is not demonstrated either to EPA or a state through the financial test or any other financial assurance

mechanism specified in Subpart H of 40 C.F.R Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility.

None

5. The owner or operator identified above has asssumed certain specific responsiblities for the closure of the following hazardous waste site under the terms of a consent decree between it, the Minnesota Pollution Control Agency and Medtronic, Inc., which was issued by the District Court for the Tenth Judicial District, Anoka County, state of Minnesota, on January 26, 1984, which requires the company to provide financial assurance in the form required by 40 C.F.R. § 264.151(g) in the amount set forth below:

	Post-Closure Guarantee
National Pole and Treating Site Medtronic Parcel Fridley, Minnesota	$2,000,000

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the last fiscal year.

ALTERNATIVE II

Part B. Closure or Post-Closure Care and Liability Coverage

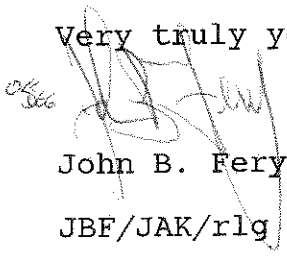
The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited year-end financial statements for the latest completed fiscal year ending December 31, 1983.

	Facility International Falls
1. Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 2,037,000
2. Amount of annual aggregate liability coverage to be demonstrated	$ 6,000,000
3. Sum of lines 1* and 2	$ 8,037,000
4. Current bond rating of most recent issuance and name of rating service	A3 (Moody's)
5. Date of issuance of bond	December 1, 1983
6. Date of maturity of bond	December 1, 2008
*7. Tangible net worth (if any portion of the closure or post-closure cost estimate is included in "total liabilities" on your financial statements, you may add that portion to this line)	$1,391,257,000
*8. Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	N/A

	YES	NO
9. Is line 7 at least $10 million?	X	
10. Is line 7 at least 6 times line 3?	X	
*11. Are at least 90% of assets located in the U.S.? If not, complete line 12	X	
12. Is line 8 at least 6 times line 3?	N/A	

I hereby certify that the wording of this letter is identical to the wording specified in 40 C.F.R. § 264.151(g) as such regulations were constituted on the date of this letter except for the additional paragraph 5 above concerning the Fridley site which is included in the interest of providing a full disclosure of the company's obligations in respect of closure of hazardous waste sites.

Very truly yours,



John B. Fery

JBF/JAK/rlg

8 MAR 1984

5HW-13

Mr. Ronald G. Leon
Boise Cascade Corporation
Hardboard Manufacturing
400 West 2nd Street
International Falls, Minnesota 56649

MND980700884

RE: Boise Cascade Corporation
EPA ID No.: MNT 280-010-695
400 W. 2nd Street
International Falls, MN

Dear Mr. Leon:

This is to inform you that your request for an extension of time until March 31, 1984, for your submittal of financial responsibility documents has been granted.

If you believe your facility does not transport, store or dispose of hazardous waste, you should submit supporting documentation and request that Part A of your permit application be withdrawn. This information should also be submitted by March 31, 1984.

Your failure to submit the above information may result in further enforcement action by this office.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM H. MINER

William H. Miner, Chief
Technical, Permits, and Compliance Section
Waste Management Branch

cc: Rodney Massey, MPCA

bcc: Banaszek
Dimock

5HW-13:PDimock:PGace:3-1-84

	TYPIST	AUTHOR	SEC #1 CHIEF	SEC #2 CHIEF	SEC #3 CHIEF	CHIEF	CHIEF	
INITIALS	PG	PEN		DJB		[illegible]		
DATE	3-1-84	3-2-84		3-7-84		3/8/84		

Timber and Wood Products Group

Boise Cascade

Insulite Manufacturing
International Falls, Minnesota 56649
(218) 285-5011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 10, 1984

RCRA Activities
ATTN: Financial Requirements
P.O. Box 3587
Chicago, IL 60690

MND 980700884

Subject: Boise Cascade Corporation
EPA ID No. MNT 280 010 695 NRS 1
400 W. 2nd Street
International Falls, Minnesota 56649

Ladies and Gentlemen:

The purpose of this letter is to respond to your letter of January 31, 1984, regarding the need for our facility to meet the financial requirements established by the Resource Conservation and Recovery Act (RCRA). On February 9, 1984, I talked with Paul Dimock of EPA concerning the applicability of the EPA's financial requirements to our facility. Based on this conversation, I am hereby requesting that Boise Cascade be given until March 31, 1984, to secure the necessary forms and other information required to meet your request.

All further correspondence regarding this matter should be addressed to:

Ronald G. Leen (Facility contact effective 1/1/84)
Environmental Specialist
Boise Cascade Hardboard Manufacturing
2nd Street
International Falls, Minnesota 56649

Please give me a call if you have any questions.

Sincerely,

Ronald G. Leen

Ronald G. Leen
Environmental Specialist

RGL/bjp

cc: Rod Massey, MPCA

okay by me - TBS
Next SEC report due 03-31-84

C.2 Compliance And Enforcement

BARR ENGINEERING CO.
CONSULTING ENGINEERS

DOUGLAS W. BARR
JOHN D. DICKSON
L. R. MOLSATHER
ALLAN GEBHARD
LEONARD J. KREMER
DENNIS E. PALMER

6800 FRANCE AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55435-2062
TELEPHONE (AREA 612) 920-0655

January 24, 1985

Mr. Dale Wikre
Minnesota Pollution Control Agency
1935 West County Road B2
Roseville, Minnesota 55113

Dear Mr. Wikre:

On behalf of Boise Cascade, Timber and Wood Products Group, Hardboard Products, International Falls, Minnesota, we are submitting this letter to follow up our December 27, 1984 letter regarding manifests of waste from the Paint Waste Disposal Site. All shipments of hazardous waste from the site have now been received at the disposal facility.

The four outstanding manifests of material, 41-107, 41-110, 41-113 and 41-114 have been received at Fondessy Enterprises, executed, and returned to Boise Cascade. Copies of the fully executed manifests and disposal certificates are enclosed.

Please contact me if there are any questions.

Yours truly,

James R. Langseth

JRL/111
enc.
c: Director, MPCA
Paul Klinge, MPCA
Larry Livesay, MPCA
Ken Skahn, U.S. EPA, Region V
Paul Thomsen, Boise Cascade

BARR ENGINEERING CO.
CONSULTING ENGINEERS

DOUGLAS W. BARR
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DENNIS E. PALMER

6800 FRANCE AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55435-2062
TELEPHONE (AREA 612) 920-0655

January 24, 1985

Mr. Dale Wikre
Minnesota Pollution Control Agency
1935 West County Road B2
Roseville, Minnesota 55113

Dear Mr. Wikre:

On behalf of Boise Cascade, Timber and Wood Products Group, Hardboard Products, International Falls, Minnesota, we are submitting this letter to follow up our December 27, 1984 letter regarding manifests of waste from the Paint Waste Disposal Site. All shipments of hazardous waste from the site have now been received at the disposal facility.

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Please contact me if there are any questions.

Yours truly,

James R. Langseth

JRL/111
enc.
c: Director, MPCA
Paul Klinge, MPCA
Larry Livesay, MPCA
Ken Skahn, U.S. EPA, Region V
Paul Thomsen, Boise Cascade

License 76850 Acceptance Code 0719 CT

Please print or type. (Form designed for use on elite (.ch) typewriter.) 41-107

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND 980 700 884 | Manifest Document No.

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Boise Cascade - Hardboard Manufacturing
400 Second St.
International Falls, MN 56649

4. Generator's Phone (218) 285-5351

A. State Manifest Document Number 41-107

B. State Generator's ID

5. Transporter 1 Company Name G+T Trucking

6. US EPA ID Number MND064770266

C. State Transporter's ID TR0022

D. Transporter's Phone 612-461-2180

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Fondessy Enterprises Inc.
876 Otter Creek Rd.
Oregon, Ohio 43616

10. US EPA ID Number OHD045243706

G. State Facility's ID 03-48-0092

H. Facility's Phone 419-726-1521

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Flammable Waste Solid N.O.S. Flammable Solid UN 1325	X	67	DM	2169	P T	D001 D005 D006 D008
b.				43380.		
c.						
d.						

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
SCLF-H-DBL.

15. Special Handling Instructions and Additional Information
clean up spills immediately, non-sparking tools only

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month	Day	Year
John D. Dickson	John D. Dickson	1	7	85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
Howard Anderson	Howard Anderson	1	7	85

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month	Day	Year
Jeff HARDING	Jeff Harding	1	8	85

GENERATOR | TRANSPORTER | FACILITY

Style F15-6 Labelmaster, Chicago, IL 60646 (312) 478-0900

EPA Form 8700-22 (3-84)

ORIGINAL—RETURN TO GENERATOR

F/A Fondessy Enterprises, Inc.
Associated Chemical and Environmental Services, Inc.
876 Otter Creek Road
Oregon, OH 43616

USEPA ID OHD 045243706
Ohio EPA 03-48-0092

CERTIFICATE OF DISPOSAL

PART A — Generator Information

Generator Name BOISE CASCADE

Generator USEPA ID# OHD980700934

Manifest Document No. 41107

PART B — Waste Disposal Information

Product Code Number	Disposal Date Mo. Day Year	Disposal Method	Container No.	Container Type	Weight
719CT	1 8 95	D81	67	DR	21.67 T
					647.46 LBS

Disposal Method = D081-Landfill; D082-Landfarm; T04-Treatment

Cell 17

Container Types = DR-Drum; TR-Truck; CT-Cargo Tanker; VT-Vacuum Tanker; RO-Rolloff

I certify receipt and disposal of the above identified wastes at this facility. I certify that the above described wastes were disposed according to all applicable state & federal permits and requirements imposed by the generator.

SIGNATURE Stephen Frankart

DATE 1-9-95

TITLE Asst Scale Master

DISTRIBUTION OF COPIES
WHITE — Office
CANARY — Generator
PINK — EPA

License 93240 Acceptance Code 0719 CT

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND980700884 | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Boise Cascade - Hardboard Manufacturing
400 Second St
International Falls, MN 56649
4. Generator's Phone (218) 285 - 5351

A. State Manifest Document Number 41-110
B. State Generator's ID

5. Transporter 1 Company Name: G+T Trucking
6. US EPA ID Number: MND064770266
C. State Transporter's ID TR0022
D. Transporter's Phone 612-461-2180

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
Fondessy Enterprises Inc.
876 Otter Creek Rd.
Oregon, Ohio 43616
10. US EPA ID Number: OHD045243706
G. State Facility's ID 03-48-0092
H. Facility's Phone 419-726-1521

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Flammable Waste Solid N.O.S. Flammable Solid UN*1325	X	69	DM	22163	P	D001 D005 D008
b.					45260.		
c.							
d.							

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: SCLF-H-D81.

15. Special Handling Instructions and Additional Information
clean up spills immediately, non-sparking tools

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date (Month Day Year)
John D. Dickson	John D. Dickson	1 8 85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)
Howard Anderson	Howard Anderson	1 7 85

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date (Month Day Year)
Jeff HARDING	Jeff Harding	1 9 85

GENERATOR | TRANSPORTER | FACILITY

Style F15-6 Labelmaster, Chicago, IL 60646 (312) 478-0900 EPA Form 8700-22 (3-84)

ORIGINAL-RETURN TO GENERATOR

F/A Fondessy Enterprises, Inc.
Associated Chemical and Environmental Services, Inc.
876 Otter Creek Road
Oregon, OH 43616

USEPA ID OHD 045243706
Ohio EPA 03-48-0092

CERTIFICATE OF DISPOSAL

PART A — Generator Information

Generator Name Boise Cascade Generator USEPA ID# MIND 980700854

Manifest Document No. 4110

PART B — Waste Disposal Information

Product Code Number	Disposal Date Mo. Day Year	Disposal Method	Container No. Type		Weight
719CT	1 9 85	D81	69	VR	22.63T
					655,94 lb VR.

Disposal Method = D081-Landfill; D082-Landfarm; T04-Treatment

21-22 555-590

Container Types = DR-Drum; TR-Truck; CT-Cargo Tanker; VT-Vacuum Tanker; RO-Rolloff

KK LL MM NN

I certify receipt and disposal of the above identified wastes at this facility. I certify that the above described wastes were disposed according to all applicable state & federal permits and requirements imposed by the generator.

SIGNATURE Mark Douglas DATE 1-9-85

TITLE Scale Master

DISTRIBUTION OF COPIES
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PINK — EPA

License #93241 Acceptance Code 0719 CT

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND980700884 | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Boise Cascade - Hardboard Manufacturing
400 Second St.
International Falls, MN 56649
4. Generator's Phone (218) 285-5351

A. State Manifest Document Number 41-113
B. State Generator's ID

5. Transporter 1 Company Name: G+T Trucking | 6. US EPA ID Number: MND064770266 | C. State Transporter's ID TR0072 | D. Transporter's Phone 612-461-2180
7. Transporter 2 Company Name | 8. US EPA ID Number | E. State Transporter's ID | F. Transporter's Phone

9. Designated Facility Name and Site Address
Fondessy Enterprises, Inc.
876 Otter Creek Rd.
Oregon, Ohio 43616
10. US EPA ID Number: OHD045243706
G. State Facility's ID 03-48-0092
H. Facility's Phone 419-726-1521

GENERATOR

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Flammable Waste Solid N.O.S. Flammable Solid UN#1325	X	59	DM		P	D001 D005 D006 D008
b.					22.48 Tons.		
c.					44960.		
d.							

J. Additional Descriptions for Materials Listed Above
33 55gal Drums 12.57T.
26 OPK (55gal) 9.91T.

K. Handling Codes for Wastes Listed Above
SCLF-H-D81.

15. Special Handling Instructions and Additional Information
clean up spills immediately, non-sparking tools

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: John D. Dickson | Signature | Date: Month 12 Day 27 Year 84

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Howard Anderson | Signature | Date: Month 12 Day 27 Year 84

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Jeff HARDING | Signature | Date: Month 1 Day 8 Year 85

Style F15-6 Labelmaster, Chicago, IL 60646 (312) 478-0900

EPA Form 8700-22 (3-84)

ORIGINAL—RETURN TO GENERATOR

F/A Fondessy Enterprises, Inc.
Associated Chemical and Environmental Services, Inc.
876 Otter Creek Road
Oregon, OH 43616

USEPA ID OHD 045243706
Ohio EPA 03-48-0092

CERTIFICATE OF DISPOSAL

PART A — Generator Information

Generator Name ECISE CASCADE Generator USEPA ID# FIND 9507005844

Manifest Document No. 41113

PART B — Waste Disposal Information

Product Code Number	Disposal Date Mo. Day Year	Disposal Method	Container No. Type		Weight
719CT	1 8 85	D81	59	DR	22.49T
					762.03LB/DR

CELL H

Disposal Method = D081-Landfill; D082-Landfarm; T04-Treatment

Container Types = DR-Drum; TR-Truck; CT-Cargo Tanker; VT-Vacuum Tanker; RO-Rolloff

KK-LL-MM 20
500 PPM LEVEL

I certify receipt and disposal of the above identified wastes at this facility. I certify that the above described wastes were disposed according to all applicable state & federal permits and requirements imposed by the generator.

SIGNATURE Stephen Forkhart DATE 1-9-85

TITLE Asst Landfill Manager

DISTRIBUTION OF COPIES
WHITE — Office
CANARY — Generator
PINK — EPA

Acceptance # 0719 CT

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND 980700884 | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Boise Cascade-Hardboard Manufact.
400 Second St.
Int'l Falls, MN 56649

4. Generator's Phone (218) 285-5351

A. State Manifest Document Number: 41-114

B. State Generator's ID:

5. Transporter 1 Company Name: G+T Trucking

6. US EPA ID Number: MND 064770266

C. State Transporter's ID: TR0022

D. Transporter's Phone: (612) 461-2180

7. Transporter 2 Company Name:

8. US EPA ID Number:

E. State Transporter's ID:

F. Transporter's Phone:

9. Designated Facility Name and Site Address: Fondessy Enterprises
876 Otter Creek Rd
Oregon, Ohio 43616

10. US EPA ID Number: OHD 045243706

G. State Facility's ID: 03-48-0092

H. Facility's Phone: (419) 726-1521

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Flammable Waste Solid, n.o.s. Flammable Solid UN 1325	X	26	DM		P	D001 D005 D006 ~~D007~~ D008
b.				22123	P	
c.				11.06	T	
d.						

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: SCIFCellHA81

15. Special Handling Instructions and Additional Information

Clean up spills immediately, using non-sparking tools
Notify O.H. Materials @ (612) 935-4804

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month	Day	Year
John D Dickson	John D Dickson	1	8	85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
Howard Anderson	Howard Anderson	1	7	85

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month	Day	Year
MARK Douglas	Mark Douglas	1	8	85

GENERATOR / TRANSPORTER / FACILITY

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ORIGINAL—RETURN TO GENERATOR

F/A Fondessy Enterprises, Inc.
Associated Chemical and Environmental Services, Inc.
876 Otter Creek Road
Oregon, OH 43616

USEPA ID OHD 045243706
Ohio EPA 03-48-0092

CERTIFICATE OF DISPOSAL

PART A — Generator Information

Generator Name [illegible] Generator USEPA ID# MDD 980700994

Manifest Document No. 41114.

PART B — Waste Disposal Information

Product Code Number	Disposal Date Mo. Day Year	Disposal Method	Container No.	Container Type	Weight
0719-CT	1 9 85	D 8 1	26	DRS	11.26 T
					85091 LB/DR

Disposal Method = D081-Landfill; D082-Landfarm; T04-Treatment

Container Types = DR-Drum; TR-Truck; CT-Cargo Tanker; VT-Vacuum Tanker; RO-Rolloff

Cell H
588 TO 590 [illegible]
L-MM-NN-21

I certify receipt and disposal of the above identified wastes at this facility. I certify that the above described wastes were disposed according to all applicable state & federal permits and requirements imposed by the generator.

SIGNATURE [signature] DATE 1-9-85

TITLE [illegible]

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BARR ENGINEERING CO.
CONSULTING ENGINEERS

DOUGLAS W. BARR
JOHN D. DICKSON
L. R. MOLSATHER
ALLAN GEBHARD
LEONARD J. KREMER
DENNIS E. PALMER

6800 FRANCE AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55435-2062
TELEPHONE (AREA 612) 920-0655

January 24, 1985

Mr. Dale Wikre
Minnesota Pollution Control AGency
1935 West County Road B2
Roseville, Minnesota 55113

Dear Mr. Wikre:

On behalf of Boise Cascade, Timber and Wood Products Group, Hardboard Products, International Falls, Minnesota, we are submitting this letter to follow-up our December 27, 1984 letter regarding manifests of waste from the Sidings Paint Waste Project. All shipments of hazardous waste from the site have now been received at the disposal facility.

The one rejected drum from manifest 54-001 has been repackaged into two drums, given manifest number 54-003 and has been received at Fondessy Enterprises. Manifest 54-003 has been executed and returned to Boise Cascade. Copies of the fully executed manifest and disposal certificate are enclosed.

Please contact me if there are any questions.

Yours truly,

James R. Langseth

JRL/111
enc.
c: Director, MPCA
Paul Klinge, MPCA
Larry Livesay, MPCA
Ken Skahn, U.S. EPA, Region V
Paul Thomsen, Boise Cascade

Acceptance # 0719 BT

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND 980700 884 | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address: Boise Cascade - Hardboard Manufacturing, 400 Second Street, International Falls, MN 56649

A. State Manifest Document Number: 54-01B

B. State Generator's ID:

4. Generator's Phone: (218) 285-5351

5. Transporter 1 Company Name: G+T Trucking

6. US EPA ID Number: MND064770266

C. State Transporter's ID: TR0022

D. Transporter's Phone: (612) 461-2180

7. Transporter 2 Company Name:

8. US EPA ID Number:

E. State Transporter's ID:

F. Transporter's Phone:

9. Designated Facility Name and Site Address: Foodesy Enterprises, Inc., 876 Otter Creek Rd., Oregon, Ohio 43616

10. US EPA ID Number: OHD045243706

G. State Facility's ID: 03-48-0092

H. Facility's Phone: (419) 726-1521

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Flammable Waste, solid, n.o.s. Flammable Solid UN 1325	X	2	DM	.85T	P	D001 D005 D006 D008
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: SCIFC811HD81

15. Special Handling Instructions and Additional Information

Clean up spills immediately using non-sparking tools

Notify O-H. Materials @ (612) 935-4804

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date: Month	Day	Year
John D Dickson	John D. Dickson	1	8	85

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Year
Howard Howard Anderson	Howard Anderson	1	7	85

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date: Month	Day	Year
MARK Douglas	Mark Douglas	1	9	85

Style F15-6 Labelmaster, Chicago, IL 60646 (312) 478-0900 EPA Form 8700-22 (3-84)

ORIGINAL—RETURN TO GENERATOR

F/A Fondessy Enterprises, Inc.
Associated Chemical and Environmental Services, Inc.
876 Otter Creek Road
Oregon, OH 43616

USEPA ID OHD 045243706
Ohio EPA 03-48-0092

CERTIFICATE OF DISPOSAL

PART A — Generator Information

Generator Name Boise Cascade Generator USEPA ID# OHD982700891

Manifest Document No. 54003

PART B — Waste Disposal Information

Product Code Number	Disposal Date Mo. Day Year	Disposal Method	Container No.	Container Type	Weight
719-BT	1 19 85	D81	2	DRS.	.85 T
					850.71 lb/DR

Cell H
588 to 590 Revel
21-LL-MM-NN

Disposal Method = D081-Landfill; D082-Landfarm; T04-Treatment

Container Types = DR-Drum; TR-Truck; CT-Cargo Tanker; VT-Vacuum Tanker; RO-Rolloff

I certify receipt and disposal of the above identified wastes at this facility. I certify that the above described wastes were disposed according to all applicable state & federal permits and requirements imposed by the generator.

SIGNATURE [signature] DATE 1-9-85

TITLE [signature]

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CANARY — Generator
PINK — EPA

700
6003

Minnesota Pollution Control Agency

October 23, 1984

Mr. Ron Leen
Boise Cascade - Hardboard Products
International Falls, Minnesota 56649

Dear Mr. Leen:

The purpose of this letter is to summarize our October 12,1984 inspection of Boise Cascade's hazardous waste storage area at the sidings plant. Bill Libro and myself inspected both the area where the hazardous waste containers were stored at the plant, and the repacked containers now awaiting transport in the semi-trailer at the Rainer site.

Based on our observations and discussion with you, closure of the hazardous waste storage area will be complete under Resource Conservation and Recovery Act (RCRA) upon certification of closure by a professional engineer and the shipment of the waste to a permitted disposal facility.

Please forward a copy of your closure certification and manifests for review and approval. If you have any questions, please contact me.

Sincerely,

Darryl J. Weakley
Hazardous Waste Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

DJW/ch

cc: Richard Dell, EPA, Chicago
John Pegors, MPCA, Duluth

Phone: 612/296-7277
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

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MND980700884

RB 1/1/85

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LEONARD J. KREMER
DENNIS E. PALMER

6800 FRANCE AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55435-2062
TELEPHONE (AREA 612) 920-0655

December 27, 1984

Mr. Dale Wikre
Minnesota Pollution Control Agency
1935 West County Road B-2
Roseville, Minnesota 55113

Dear Mr. Wikre:

On behalf of Boise Cascade, Timber and Wood Products Group, Hardboard Products, International Falls, Minnesota, we are submitting this letter regarding manifests of waste from the Paint Waste Disposal Site. Forty-five days have passed since certain shipments of hazardous waste left the site and this letter describes the status of those shipments.

Manifests of material shipped from the Paint Waste Disposal Site but not yet disposed of are: 41-107, shipped November 3; 41-110, shipped November 5; 41-113, shipped November 6; and 41-114, shipped November 7.

We have inquired of the contractor, the disposal facility and the transporter regarding the status of the material from these manifests. The contractor is O.H. Materials, 1513 East Excelsior Boulevard, Box 427, Hopkins, Minnesota 55343, phone 612/935-4804; the disposal facility is Fondessy Enterprises, Inc., 876 Otter Creek Road, Oregon, Ohio 43616, phone 419/726-1521; and the transporter is G & T Trucking, 11111 Deuce Road, Elko, Minnesota 55020, phone 612/461-2180.

The material on manifest 41-110 was rejected at the disposal facility as not being designated flammable when it contained flammable material. The load of drums on manifest 41-110 was returned to G & T Trucking's facility in Minnesota. That material and the material on manifests 41-107, 41-113, and 41-114 is being held in fully enclosed box trailers at G & T Trucking in Minnesota, and is being retested and relabeled for proper flammability designation. When the retesting and relabeling is complete, the material will be shipped to Fondessy Enterprises for disposal. It is anticipated that the four loads will be shipped on December 27 or 28, 1984.

Please contact me with any comments or questions you may have regarding this matter (612/920-0655).

Yours truly,

James R. Langseth

JRL/tmk
c: Director, MPCA
Paul Klinge, MPCA
Larry Livesay, MPCA
Ken Skahn, U.S. EPA, Region V
Paul Thomsen, Boise Cascade

Acceptance Code 719 AT

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND980700884 | Manifest Document No. 41-107 | 2. Page 1 of | Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
Boise Cascade - Hardboard Manufacturing
400 Second St.
International Falls 56649
4. Generator's Phone (218) 285-5351

A. State Manifest Document Number 41-107
B. State Generator's ID

5. Transporter 1 Company Name: G & T Trucking
6. US EPA ID Number: MND064770266
C. State Transporter's ID TR0022
D. Transporter's Phone 612-461-2180

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
Landessy Enterprises Inc.
876 Otter Creek Rd.
Oregon, Ohio 43616
10. US EPA ID Number: OHD045243706
G. State Facility's ID 03-48-0092
H. Facility's Phone 419-726-1521

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Solid N.O.S. ORM-E NA9189	X	67	DM			D008
b. Weight						
c.						
d.						

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
clean up spills immediately

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name | Signature | Date Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Date Month Day Year

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GENERATOR COPY

Acceptance Code 719 AT

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41-110

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND980705854 — Manifest Document No.

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Boise Cascade - Hardboard Manufacturing
400 Second St.
International Falls, MN 56649
4. Generator's Phone (218) 285-5351

A. State Manifest Document Number 41-110
B. State Generator's ID

5. Transporter 1 Company Name: G + T Trucking — 6. US EPA ID Number: MNDO64770266 — C. State Transporter's ID: TR0022 — D. Transporter's Phone: 612-461-2150

7. Transporter 2 Company Name — 8. US EPA ID Number — E. State Transporter's ID — F. Transporter's Phone

9. Designated Facility Name and Site Address
Fondessy Enterprises Inc.
276 Otter Creek Rd.
Oregon, Ohio 43616
10. US EPA ID Number: OHD045243706
G. State Facility's ID: 03-48-0092
H. Facility's Phone: 419-726-1521

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Solid N.O.S. ORM-E NA9189	X	69	DM		P	D008
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Clean up spills immediately

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month	Day	Year
[illegible]	[signature]	11	5	84

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
[illegible]	[signature]	11	5	84

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month	Day	Year

Style F15-6 Labelmaster, Chicago, IL 60646 (312) 478-0900

EPA Form 8700-22 (3-84)

GENERATOR COPY

Acceptance Code 0719 AT

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND980700884 — Manifest Document No. — 2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Boise Cascade - Hardboard Manufacturing
400 Second St.
International Falls, MN 56649
4. Generator's Phone (218) 285-5351

A. State Manifest Document Number 41-113
B. State Generator's ID

5. Transporter 1 Company Name: G & T Trucking — 6. US EPA ID Number: MND064770266
C. State Transporter's ID: TR0022
D. Transporter's Phone: 612-461-2182

7. Transporter 2 Company Name — 8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
Fondessy Enterprises Inc.
896 Otter Creek Rd.
Oregon, Ohio 43616
10. US EPA ID Number: OHD045243706
G. State Facility's ID: 03-48-0092
H. Facility's Phone: 419-726-1521

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Solid N.O.S. ORM-E UN# 9189	X	33	DM		P	D005
b. Flammable Waste Solid, N.O.S. Flammable Solid, UN# 1325	X	26	DM		P	D001
c.						
d.						

J. Additional Descriptions for Materials Listed Above
Acceptance Code for Flammable Waste Solid: 0719 CT

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
clean up spills immediately, non-sparking tools

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date Month	Day	Year
Ronald E Lee	Ronald E Lee	11	6	84

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year
HARLIN H. KOTH	Harlin H. Koth	11	6	84

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Date Month	Day	Year

GENERATOR / TRANSPORTER / FACILITY

Style F15-6 Labelmaster, Chicago, IL 60646 (312) 478-0900 EPA Form 8700-22 (3-84)

GENERATOR COPY

Acceptance Code 0719 CT

Please print or type. (Form designed for use on elite (12) typewriter.) 41-114 Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND980703884 — Manifest Document No. 41-114 — 2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
Boise Cascade - Hardboard Manufacturing
400 Second St
International Falls, MN 56649
4. Generator's Phone (218) 285 5551

A. State Manifest Document Number 41-114
B. State Generator's ID

5. Transporter 1 Company Name: G & T Trucking — 6. US EPA ID Number: MND064770266 — C. State Transporter's ID: TK 0022 — D. Transporter's Phone: 612-461-2180

7. Transporter 2 Company Name — 8. US EPA ID Number — E. State Transporter's ID — F. Transporter's Phone

9. Designated Facility Name and Site Address
Fondessy Enterprises Inc.
876 Otter Creek Rd.
Oregon, Ohio 43616
10. US EPA ID Number: OHD045243706
G. State Facility's ID: 03-48-0092
H. Facility's Phone: 419-726-1521

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Flammable Waste Solid, N.O.S. Flammable Solid, UN# 1325	X	25	DM		P	D001
b. Hazardous Waste Solid, N.O.S. ORM-E, UN# 9189	X	1	DM		P	D006
c.						
d.						

J. Additional Descriptions for Materials Listed Above
Acceptance Code for Hazardous Waste Solid: 0719AT

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
clean up spills immediately, non-sparking tools

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name: R. J. LEFL — Signature: [signature] — Date: Month 11 Day 7 Year 84

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: DONALD L DOLS — Signature: Donald L. Dols — Date: Month 11 Day 7 Year 84

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Date: Month Day Year

Style F15-6 Labelmaster, Chicago, IL 60646 (312) 478-0900 EPA Form 8700-22 (3-84)

GENERATOR COPY

BARR ENGINEERING CO.
CONSULTING ENGINEERS

DOUGLAS W. BARR
JOHN D. DICKSON
L. R. MOLSATHER
ALLAN GEBHARD
LEONARD J. KREMER
DENNIS E. PALMER

6800 FRANCE AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55435-2062
TELEPHONE (AREA 612) 920-0655

December 27, 1984

Mr. Dale Wikre
Minnesota Pollution Control Agency
1935 West County Road B-2
Roseville, Minnesota 55113

Dear Mr. Wikre:

On behalf of Boise Cascade, Timber and Wood Products Group, Hardboard Products, International Falls, Minnesota, we are submitting this letter regarding manifests of waste from the Sidings Paint Waste Project. Forty-five days have passed since certain shipments of hazardous waste left the site and this letter describes the status of those shipments.

Manifest 54-001, material shipped from the Sidings Paint Waste Project, has been received by Boise Cascade, but one drum was rejected at the disposal facility.

We have inquired of the contractor, the disposal facility and the trucking firm regarding the status of the material from this manifest. The contractor is O.H. Materials, 1513 East Excelsior Boulevard, Box 427, Hopkins, Minnesota 55343, phone 612/935-4804; the disposal facility is Fondessy Enterprises, Inc., 876 Otter Creek Road, Oregon, Ohio 43616, phone 419/726-1521; and the transporter is G & T Trucking, 11111 Deuce Road, Elko, Minnesota 55020, phone 612/461-2180.

One drum from manifest 54-001 was rejected at Fondessy due to the presence of free liquid in a drum designated as containing only solid material. That drum was returned to G & T Trucking in Elko, Minnesota, was repackaged into two drums, solidified, and will be shipped to Fondessy along with the material currently listed on manifest 41-114. It is anticipated that this material will be shipped on December 27 or 28, 1984.

Please contact me with any comments or questions you may have regarding this matter (612/920-0655).

Yours truly,

James R. Langseth

JRL/tmk

c: Director, MPCA
Paul Klinge, MPCA
Larry Livesay, MPCA
Ken Skahn, U.S. EPA, Region V
Paul Thomsen, Boise Cascade

[redacted] (MA)

e print or type. (Form designed for use on elite (' tch) typewriter.) 54-001

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MND 980 700 884 | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Boise Cascade - Hardboard Manufacturing
400 Second St
International Falls MN 56649
4. Generator's Phone (218) 285 - 5351

A. State Manifest Document Number: 54-001
B. State Generator's ID:

5. Transporter 1 Company Name: G+T Trucking
6. US EPA ID Number: MND064770266
C. State Transporter's ID: TR0022
D. Transporter's Phone: 612-461-2180

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
Fondessy Enterprises Inc.
876 Otter Creek Rd.
Oregon, Ohio 43616
10. US EPA ID Number: OHD045243706
G. State Facility's ID: 03-48-0092
H. Facility's Phone: 419-726-1521

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Flammable Waste Solid N.O.S. ~~ORM-E UN#1325~~ MA	X	~~33~~	DM		P	D001
b.	FLAMMABLE SOLID #UN1325 ACCEPTANCE 0719 CT (MA)		32		23716	P	
c.					1186	T	
d.							

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: D81

15. Special Handling Instructions and Additional Information
clean-up spills immediately - non-sparking tools

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date (Month Day Year)
Ronald G. Leen	Ronald G. Leen	11 2 84

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)
George Stage	George Stage	11 2 84

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)

19. Discrepancy Indication Space
1 Drum rejected because it does not meet pcn requirements contains free liquid no room for solidification

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
D81 SCL Fcell H

Printed/Typed Name	Signature	Date (Month Day Year)
Dale M Pertner	Dale M Pertner	11 08 84

GENERATOR / TRANSPORTER / FACILITY

Style F15-6 Labelmaster, Chicago, IL 60646 (312) 478-0900

EPA Form 8700-22 (3-84)

ORIGINAL—RETURN TO GENERATOR

586
494

Minnesota Pollution Control Agency

August 28, 1984

Mr. Ron Leen
Boise Cascade Insulite Division
International Falls, Minnesota 56649

Dear Mr. Leen:

This letter acknowledges our August 20, 1984 phone conversation regarding my July 25, 1984 inspection. As mentioned in our phone conversation, PCB's are not regulated under the Resource Conservation and Recovery Act (RCRA), however they are regulated under the revised Minnesota hazardous waste rules which will be replacing RCRA when Minnesota completes final authorization from the U.S. Environmental Protection Agency (EPA).

Also, I have enclosed the small quantity generator inspection report that is forwarded to EPA. If you have any further questions, please contact me at 612/296-7277.

Sincerely,

Darryl J. Weakley
Hazardous Waste Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

DJW:cj

Enclosure

cc: Richard Dell, U.S. EPA, Chicago

fw 9/5

Phone: 612/296-7277
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

RCRA Inspection Report

EPA Identification Number: MND 980700284

Installation Name: Boise Cascade Insulite Division

Location Address: International Falls

City: _____ State: MN

Date of inspection: 7/25/84 Time of inspection (from) 8:00 (to) 11:30

Person(s) interviewed	Title	Telephone
Ron Leen	Environmental Specialist	218/285-5351

Inspector(s)	Agency/Title	Telephone
Darrel Winkler	MPCA/Pollution Cont. Spec.	612/296-7277
Bill Libera	MPCA/Pollution Cont. Spec.	612/296-7394

Installation Activity (mark only one box) — Inspection Form(s)

- [ ] Treatment/Storage/Disposal per 40 CFR 265.1 and Generation and/or Transportation — A
- [ ] Treatment/Storage/Disposal (no generation or Transportation) — A
- [ ] Generation and Transportation — B, C
- [ ] Generation only — B
- [ ] Transportation only — C

small Quantity generator

Minnesota Pollution Control Agency

August 14, 1984

Mr. Ron Leen
Boise Cascade Insulite Division
International Falls, Minnesota 56649

Dear Mr. Leen:

RE: RCRA Hazardous Waste Inspection
Boise Cascade Insulite Division
International Falls, MND980700884, Small Quantity Generator

The Minnesota Pollution Control Agency (MPCA) is cooperating with the U.S. Environmental Protection Agency (EPA), Region V, in carrying out the provisions of the Resource Conservation and Recovery Act (RCRA) of 1976, Public Law 94-580. In this effort, personnel of the MPCA are conducting inspections of companies in Minnesota that are engaged in the generation, transportation, storage, treatment, or disposal of hazardous wastes.

This letter acknowledges that Boise Cascade Insulite Division (company) was inspected on July 25, 1984 by Darryl Weakley and Bill Libro of the Solid and Hazardous Waste Division of the MPCA. Your company was represented by yourself.

The MPCA has determined the company to be a small quantity generator based on the generation of occasional PCB wastes and paint wastes from routine maintenance.

The company is making good progress on the drum separation process. Based on the company's testing procedures and the MPCA spot checking with the HNU Photoionizer there does not appear to be any problems with the separation method being used.

Phone: 612/296-7277
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

The MPCA requests to be notified when a disposal contractor has been selected and 48 hours prior to any of the containerized waste leaving the site.

A copy of this letter and the inspection report will be sent to the EPA, Region V office in Chicago, Illinois. If you have any questions, please contact me at 612/296-7277 or Mr. Kenneth Skahn of the EPA, Region V at 312/886-6198.

Sincerely,

Darryl J. Weakley
Hazardous Waste Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

DJW/ch

cc: Mr. Richard Dell, EPA, Chicago

RCRA Inspection Report

EPA Identification Number: M N D 9 8 0 7 0 0 8 8 4

Installation Name: Boise Cascade Insulite Division

Location Address: International Falls

City: _____ State: MN

Date of inspection: 7/25/84 Time of inspection (from) 8:00 (to) 11:30

Person(s) interviewed	Title	Telephone
Ron Leen	Environmental Specialist	218/285-5351

Inspector(s)	Agency/Title	Telephone
Darryl Weakley	MPCA/Poll. cont. Spec.	612/296-7277
Bill Libra	MPCA/Poll. cont. Spec.	612/296-7394

Installation Activity (mark only one box) — Inspection Form(s)

- II Treatment/Storage/Disposal per 40 CFR 265.1 and Generation and/or Transportation — A
- II Treatment/Storage/Disposal (no generation or Transportation) — A
- II Generation and Transportation — B, C
- II Generation only — B
- II Transportation only — C

small Quantity generator

42

Minnesota Pollution Control Agency

June 5, 1984

Mr. Ron Leen
Boise Cascade Corporation
Hardborad Manufacturing Division
Second Street
International Falls, Minnesota 56649

Dear Mr. Leen:

This letter is in response to your May 7, 1984 letter discussing layering in the barrels of paint waste.

Based on the information provided in the above mentioned letter and our June 1, 1984 phone coversation, layering would not present a major problem. To confirm this the Minnesota Pollution Control Agency (MPCA) staff will be on-site after drum separation is completed, to randomly check those barrels determined to be nonhazardous based on the Combustible Gas Indicator (CGI) reading. Should layering be evident, the MPCA will require further testing at that time.

If you have any questions, please contact me.

Sincerely,

Darryl J. Weakley
Hazardous Waste Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

DJW/ch

Phone: 612/296-7277
1935 West County Road B2, Roseville, Minnesota 55113-2785
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Minnesota Pollution Control Agency

April 25, 1984

Mr. Ron Leen
Boise Cascade Corporation
Hardboard Manufacturing Division
Second Street
International Falls, Minnesota 56649

Dear Mr. Leen:

Re: Procedure for Separation of Paint Wastes

I have reviewed Boise Cascade Corporation's (BCC) proposal for the initial screening and segregation of the 3300 55-gallon barrels of paint waste being stored on-site. The Minnesota Pollution Control Agency (MCPA) has the following concerns:

1. The Combustible Gas Indicator (CGI) is a "gross indicator" device and is not intended for specific identification. An HNU photoionizer or organic vapor analyzer are more sensitive instruments and would provide more accurate readings.

2. The use of the CGI or any other meter will not take into account any layering that may occur in the barrels.

3. Ignitability is the criteria for xylene being a listed hazardous waste under the Resource Conservation and Recovery Act (RCRA). The CGI does not measure flash point. The MSA Model 40 CGI can be used to provide preliminary information as outlined in BCC's testing proposal.

The MPCA requests BCC to provide additional information which will demonstrate there is no layering in the drums.

Phone: 612/296-7277
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

Please submit this additional information within thirty (30) days of receipt of this letter. If you have any questions, please contact me.

Sincerely,

Darryl J. Weakley
Pollution Control Specialist Intermediate
Hazardous Waste Compliance and Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

DJW/ch

cc: Richard Dell, EPA, Chicago
John Pegors, MPCA, Duluth

3/2

Minnesota Pollution Control Agency

April 25, 1984

Mr. Ron Leen
Boise Cascade Corporation
Hardboard Manufacturing Division
Second Street
International Falls, Minnesota 56649

Dear Mr. Leen:

Re: Procedure for Separation of Paint Wastes

I have reviewed Boise Cascade Corporation's (BCC) proposal for the initial screening and segregation of the 3300 55-gallon barrels of paint waste being stored on-site. The Minnesota Pollution Control Agency (MCPA) has the following concerns:

1. The Combustible Gas Indicator (CGI) is a "gross indicator" device and is not intended for specific identification. An HNU photoionizer or organic vapor analyzer are more sensitive instruments and would provide more accurate readings.

2. The use of the CGI or any other meter will not take into account any layering that may occur in the barrels.

3. Ignitability is the criteria for xylene being a listed hazardous waste under the Resource Conservation and Recovery Act (RCRA). The CGI does not measure flash point. The MSA Model 40 CGI can be used to provide preliminary information as outlined in BCC's testing proposal.

The MPCA requests BCC to provide additional information which will demonstrate there is no layering in the drums.

Phone: 612/296-7277
1935 West County Road B2, Roseville, Minnesota 55113-2785
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Please submit this additional information within thirty (30) days of receipt of this letter. If you have any questions, please contact me.

Sincerely,

Darryl J. Weakley
Pollution Control Specialist Intermediate
Hazardous Waste Compliance and Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

DJW/ch

cc: Richard Dell, EPA, Chicago
John Pegors, MPCA, Duluth

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-13

JAN 3 1 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Allan W. Meadows
Pollution Abatement Specialist
Boise Cascade Corporation
Insulite Manufacturing
400 W. 2nd Street
International Falls, Minnesota 56649

RE: Boise Cascade Corporation MND980700884
EPA I.D No. ~~MNT 280 010 695~~
400 W. 2nd Street
International Falls, Minnesota 56649

Dear Mr. Meadows:

In a letter dated April 26, 1983, the United States Environmental Protection Agency Region V, requested you to submit additional information to support your request for withdrawal of your Part A hazardous waste permit application. A response to our letter was due on May 26, 1983. Since we have not yet received the additional information requested, our records will continue to show Boise Cascade Corporation as a regulated hazardous waste management facility subject to the Resource Conservation and Recovery Act, as amended (RCRA), and regulations promulgated thereunder.

Federal regulations (40 CFR Part 265, Subpart H) require that existing hazardous waste management facilities were to have submitted proof of financial assurance for closure by July 6, 1982, and liability coverage by July 15, 1982 (40 CFR Part 265.143 and 265.147, respectively). To date, this office has not received any financial instruments from the above-referenced facility; consequently, the facility is in violation of the financial requirements of 40 CFR Part 265, Subpart H. These financial responsibility requirements are a significant part of the hazardous waste management regulations.

Failure to submit the required financial instruments or documentation within fifteen (15) days of receipt of this notice may subject the above-referenced facility to enforcement action. RCRA provides for civil penalties up to $25,000 per day per violation. Please forward the necessary financial instruments or documentation to:

RCRA Activities
ATTN: Financial Requirements
P.O. Box 3587
Chicago, Illinois 60690

Please contact Mr. Paul Dimock of my staff at (312) 886-7440, if you have any questions or need additional information.

Sincerely yours,

Elmore T. Christenson

Karl J. Klepitsch, Jr., Chief for
Waste Management Branch

cc: Rod Massey, MPCA

5HW-13 RAIU LiB

P 593 664 006

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Allan Meadows	
Street and No. 400 W. 2nd Street	
P.O., State and ZIP Code International Falls Minn 56649	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	

CHICAGO, IL ... STA. USPO FEB 1984

Bosie Cascade Corporation Insulite Div.

MNT 210-010-695

PS Form 3800, Dec. 1982 ★U.S.G.P.O. 1983-403-517

Minnesota Pollution Control Agency

December 16, 1983

Mr. Russell Summer
Environmental Engineer
Boise Cascade Corporation Insulite Div
400 Second Street
International Falls, Minnesota 56649

MNT 280 010 695 old
MND 987 500 884 - new

Dear Mr. Summer:

Re: Segregation and Disposal of Accumulated Hazardous and Nonhazardous Waste Paint Sludge

This letter requests the schedule Boise Cascade (BC) Insulite Division, Sidings Plant will be following for the disposal of their containerized paint waste.

The Minnesota Pollution Control Agency (MPCA) requests BC to submit a schedule for segregating and disposing of the accumulated drums of waste paint sludge. This schedule should include the following:

1. Time frame for evaluating and disposing of all drummed paint waste.

2. Method used for determination of hazardous and nonhazardous waste.

3. Discussion of procedures for disposing of nonhazardous waste, and proposed disposal site for hazardous waste.

The MPCA requests this information to be submitted within 30 days receipt of this letter. If you have any questions, please contact me.

Sincerely,

Darryl J. Weakley
Hazardous Waste Compliance and Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

DJW/pak
cc: John Pegors, MPCA Regional Director, Region I, Duluth
Richard Dell, U.S. Environmental Protection Agency, Chicago

Phone: 612/296-7277
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

Please contact Mr. Paul Dimock of my staff at (312) 886-7440, if you have any questions or need additional information.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Rod Massey, MPCA

5HW-13:L.BAGUS:B.THOMPSON: L.BAGUS DISK #2A 12/19/83

Initials Date	Typist	Author	Other		SPIS Secy.	SPIS Chief	WMB Chief	W Director
	1-4-84	HRB 1-20-84	1-24-84	1-24-84	1/27/84	1/27/84	1/27/84	

203

Minnesota Pollution Control Agency

January 27, 1984

Mr. J. C. Hart
Boise Cascade Corporation
Insulite Manufacturing
International Falls, Minnesota 56649

MND 980 700 884

Dear Mr. Hart:

Re: Disposal of Paint Wastes

The Minnesota Pollution Control Agency (MPCA) requests Boise Cascade Corporation (BCC) to submit its solvent base paint test for review by March 15, 1984.

There appears to be some conflict with regard to the date BCC stopped using solvent base paint. Paragraph three in your January 13, 1984 letter gives two dates, February 15, 1981 and February 14, 1982, as the last day any solvent base material was used. Please clarify these dates.

The MPCA also requests BCC to give five working days notice to MPCA staff after drums have been segregated and ready for disposal.

If you have any questions please contact me.

Sincerely,

Darryl J. Weakley

Darryl J. Weakley
Pollution Control Specialist Intermediate
Hazardous Waste Compliance and Enforcement Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

DJW/ch

cc:. Richard Dell, EPA, Chicago

Phone: 612/296-7277
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

1. FILE COPY FOR INSULITE DIV. RMNG LTR FOR PAPER DIVISION
2.

Paper Div - MND 076505262 ML 91
Insulite Div - MND 980 700 884
MNT 2800 10695: old

Minnesota Pollution Control Agency

February 7, 1983

Dr. Russel Sommer
Regional Environmental Engineer
Boise Cascade Corporation
400 Second Street
International Falls, Minnesota 56649

Dear Dr. Sommer:

This letter is in regard to the Minnesota Pollution Control Agency (MPCA) staff's position on the management of hazardous wastes that are currently generated by Boise Cascade's (BC) Paper Division and hazardous paint sludges that have been stored at the Insulite Division's Sidings Plant for more than two years. I will address each position separately.

Paper Division:

Based on information provided by BC to the MPCA, the following is documented in Paper Division's hazardous waste management plan:

1. The management plan indicates that the caustic dregs and slaker grits exhibit a pH of 13.3 and 12.9, respectively.

2. Letters dated January 27, 1982 and October 21, 1982 from BC to the MPCA which discuss the proposed treatment of the caustic dregs and grits by mixing with wastewater treatment sludges on a concrete pad to lower the pH level below 12.0 prior to disposal at the Moonlight Rock Landfill (landfill).

However, based on a May 19, 1982 inspection conducted by MPCA staff, the caustic dregs and grits are taken directly to the landfill, untreated.

Existing state hazardous waste rules define a waste as hazardous under the corrosive criteria (6 MCAR § 4.9001 B.5. and § 4.9002 E.6.) if the pH is greater than 12.0 or less than 3.0. If the waste is nonaqueous, it may be mixed 1:1 with water and tested for pH and/or a dermal exposure test may be performed as outlined in 16 Code of Federal Regulation 1500.41 (1977).

Based on existing information, as outlined above, the MPCA considers the caustic dregs and slaker grits to be hazardous in nature. Therefore, the caustic wastes should be managed in accordance with the state hazardous waste rules.

Phone: 612/297-2735
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PP

The MPCA staff requests that BC discontinue the practice of disposing the untreated caustic wastes at the landfill immediately. To avoid further noncompliance with the MPCA's hazardous waste rules, it is requested that BC initiate, as previously indicated in its hazardous waste management plan, the neutralization of the caustic wastes prior to disposal.

Please be advised that the existing state hazardous waste rules and the proposed state hazardous waste rules indicate that a permit would be required for treatment of BC caustic wastes. However, if, in the future, the treatment process was undertaken in a tank rather than on a concrete pad it could fall under the definition of "elementary neutrialization facility" of the proposed rules, and, therefore, require only a permit-by-rule (i.e., no formal permit and not including provisions such as financial assurance, etc.). Alternatively, under the proposed rules, if BC can demonstrate that the caustic wastes are actually useful in the conditioning of the sludge, then the process would be considered a beneficial reuse process and no permit would be required.

Insulite Division:

In BC's November 19, 1982 response to the MPCA, BC acknowledged that they, in fact, had approximately 17 drums of solvent base waste stored at the sidings plant. Therefore, the MPCA staff considers BC, Insulite Division, to be a federal hazardous waste generator and a storage facility and, consequently, it is subject to regulation under 40 CFR Parts 260 through 265.

The EPA has received a Part "A" permit application from BC, Insulite Division, for storage, thus meeting the requirements for interim status. However, no inspection has been conducted at the Insulite Division to verify compliance with the federal requirements.

Please be advised that under interim status standards for hazardous waste facilities, the owner/operator is required to fulfill specific requirements (i.e., detailed waste analysis plan, weekly inspection, financial assurance etc.) as specified in 40 CFR Part 265. However, BC may opt to close their hazardous waste storage facility and request to withdraw their Part "A" permit application from further permitting consideration from the EPA. In order to do so, BC will have to dispose of all accumulated hazardous wastes stored on-site at an approved facility and submit a closure plan that meets the requirements of 40 CFR Part 265.111 through 265.115. The closure plan should be submitted to the EPA, Region V, Administrator and the MPCA.

The MPCA staff requests that BC submit a written response within 30 days of your receipt of this letter, which provides the following information:

1. A schedule that will address discontinuing disposal of caustic dregs and slaker grits at the Moonlight Rock Landfill. The schedule should include a plan for managing the waste in a manner that will comply with MPCA requirements.

2. A written description indicating how BC is complying with the federal hazardous waste rules concerning storage or a closure plan with signed copies of a hazardous waste manifest to verify disposal of the accumulated wastes.

If you have any further comments or questions regarding this matter, please contact Ainars Silis at 612/297-3358 or Darryl Weakley at 612/297-3366 of my staff.

Sincerely,

Dale Wikre

Dale L. Wikre
Director
Solid and Hazardous Waste Division

DLW/sf

cc: Kenneth Skahn, U.S. Environmental Protection Agency, Region V, Chicago
John Pegors, MPCA Regional Director, Duluth

D.Corrective Action

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

prc
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

BOISE CASCADE, INSULITE DIVISION INTERNATIONAL FALLS, MINNESOTA MND 980 700 884

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	MND 980 700 884
Date Prepared	:	October 16, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087MN2B
Prepared by	:	PRC Environmental Management, Inc. (Jeff Swano)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Boise Cascade, Insulite Division (Insulite) facility in International Falls, Koochiching County, Minnesota. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included as Attachment A to assist in prioritizing RCRA facilities for corrective action.

The Insulite facility was part of a Boise Cascade (Boise) manufacturing complex (Complex). The Insulite facility (EPA Identification No. MND 980 700 884) occupied the western portion of the Complex, and the Paper Division (EPA Identification No. MND 076 505 262) occupied the eastern portion. In 1971, Insulite began operating a sidings plant at a separate property about .5 miles southeast of the Complex to paint products produced at the Insulite facility. This sidings plant operated under the same EPA ID number as the Insulite facility, even though it was not on contiguous property. While the Insulite Division no longer exists and the Paper Division currently operates the Complex, the term "Insulite facility" is used in this report to describe activities at the western portion of the Complex.

In 1980, Insulite submitted a Part A permit application as a generator of solvent-based paint wastes, which were generated and stored at a container storage area at the sidings plant; no hazardous waste storage areas existed at the Insulite facility. In late 1984, Boise closed its Insulite Division, expanded the Paper Division onto the Insulite facility property, and sold the sidings plant property. PRC inspected the two separate Insulite properties: the former Insulite facility boundaries within the Complex and the former sidings plant. This report discusses past and current waste generation and management within the boundaries of the former Insulite facility. Discussion of past and current waste generation and management at the sidings plant is covered in a separate report.

The Insulite facility began operations in the 1930s, manufacturing insulation board, ceiling tile, and other pressed-board products for the home construction industry. The wastes generated from these processes included waste oil and secondary sludge from wastewater treatment. Maintenance of facility vehicles generated nonhazardous waste crankcase oil. The facility ceased operations in 1984 and most of the buildings were demolished. The Boise Paper Division (Paper) took over the Insulite property and built a paper manufacturing facility that became operational in December 1990. Current paper manufacturing operations at the facility

generate wastewater and waste process chemicals (D001). Current maintenance operations at the facility generate solvent-based paint waste (F003, F005) and nonhazardous waste oils.

The Insulite facility occupies 30 acres in a commercial and residential area. The entire Complex currently employs about 1,200 people, and it's current regulatory status is that of a large-quantity generator of hazardous waste.

The PA/VSI identified the following seven SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Waste Chemicals Storage Room
2. Waste Oil Tank
3. Paint Waste Satellite Accumulation Area
4. Lift Station No. 8
5. Former Waste Oil Drum Storage Area
6. Former Waste Crankcase Oil Drum Storage Area
7. Former Secondary Clarifier

Area of Concern

1. Oil Spill Area

Releases to ground water from the facility have not been documented. The potential for future releases to ground water is low, because wastes are currently managed indoors to decrease the potential for a release to ground water. In addition, ground water is most likely flowing north and discharging to the Rainy River located at the property's northern boundary. Ground water is used for drinking purposes in the area of the facility outside of the municipal water distribution system.

Releases to the Rainy River have occurred in the past. In 1971, Boise constructed a wastewater treatment plant at the Paper facility to serve the Complex. Prior to 1971, all Complex wastewater was disposed directly into the river. Since 1971, occasional releases of non-hazardous untreated wastewater to the river have occurred. In addition, a large oil spill in 1979 released about 5,000 gallons of oil into the river.

The potential for future releases to the Rainy River is low. All wastes are managed indoors or equipped with preventive technology to decrease the potential for a release to surface water. Surface water from the Rainy River is used for drinking water in the vicinity of the site. The intakes for the city of International Falls are located about 0.75 miles upstream and east of the facility. No intakes are located within 3 miles downstream of the facility. Individuals

receive surface water drinking water through either a municipal water distribution system or from a private hauler who refills household cisterns.

Releases of chlorine and chlorine dioxide to the air have occurred in the past and as recently as April 1992. These releases originated from accidents at a bleach plant located on Insulite property rather than SWMUs located on Insulite property. The nearest residential population is located on the western border of the facility. While it is possible that future accidents at the bleach plant may cause releases to the air, the potential for SWMUs to release to the air is low. Most wastes generated at the site are nonvolatile, and any volatile hazardous wastes are managed indoors, which decreases the potential for a release to the air.

The oil spill of 1979 may have caused a release to on-site soils. No information is available about how the soils were affected or how the spill cleanup was managed. The future potential for releases to on-site soils is low. This is due to current waste management practices that decrease the potential for a release to on-site soils.

PRC recommends that soil sampling take place in the area of the 1979 oil spill to determine if a release to on-site soils has occurred. In addition, PRC recommends that the facility follow through with plans to replace the leaking Waste Oil Tank (SWMU 2).

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Boise Cascade, Insulite Division (Insulite) facility (EPA Identification [ID] No. MND 980 700 884) in International Falls, Koochiching County, Minnesota. The PA was completed on April 3, 1992. PRC gathered and reviewed information from the Minnesota Pollution Control Agency (MPCA) and from EPA Region 5 RCRA files. The VSI was conducted on April 23, 1992. It included interviews with a facility representative and a walk-through inspection of the Insulite facility. PRC identified seven SWMUs and one AOC at the facility. In addition, the Insulite Division operated a sidings plant, under the same U.S. EPA ID number at 101 East Highway 11 in International Falls, Koochiching County, Minnesota. At the request of EPA, a PA/VSI report will be prepared for

each facility. This report covers the past and current waste generation and management of the Insulite facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and five inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The Insulite facility was located at 400 West Second Street in International Falls, Koochiching County, Minnesota. Figure 1 shows the location of the Insulite facility (latitude 48° 36' 30" N and longitude 93° 24' 20" W) and the sidings plant in relation to each other and the surrounding topographic features. The facility covers about 30 acres in a commercial/residential area.

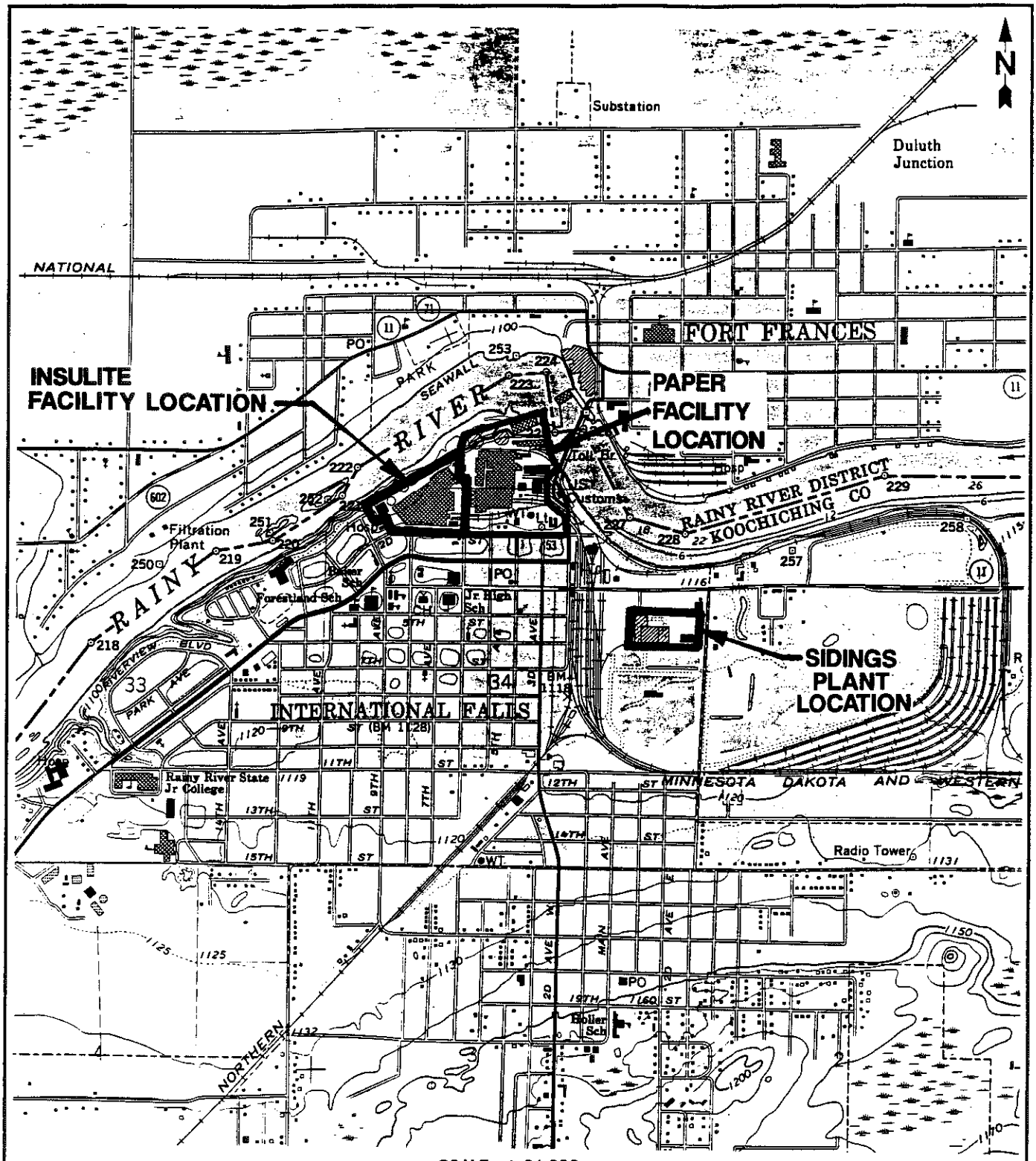
The Insulite facility occupied the western portion of the 90-acre Boise Cascade (Boise) Manufacturing complex (Complex) in International Falls, Minnesota. The eastern 60 acres of the Complex was occupied by the Boise Paper Division (Paper) facility (EPA ID No. MND 076 505 262). Currently, the Paper Division operates the entire Complex, and while the Insulite Division no longer exists, the Insulite facility is used in this report to describe the activities on the western portion of the Complex.

The facility is bordered on the north by the Rainy River, which is the international border between Canada and the United States; on the west by a residential area; on the south by commercial downtown International Falls; and on the east by the Paper facility.

2.2 FACILITY OPERATIONS

The former Insulite facility was composed of several buildings: the Insulite mill, covering about 63,500 square feet; two Insulite warehouses, covering a total of about 60,000 square feet; a secondary treatment building, covering about 7,500 square feet; and a smaller research building. Before Boise closed the Insulite facility, the facility employed about 300 people.

In the 1910s, Boise began manufacturing paper at its Paper facility. Boise has owned and operated the facility since operations began at this property. In the mid 1930s, Boise established the Insulite Division to manufacture insulation board, ceiling tile, and other pressed-board products. In 1984, Boise dissolved the Insulite Division. Between 1987 and 1988, Boise demolished most of the Insulite facility. In 1990, the Paper Division completed construction of



SOURCE: MODIFIED FROM USGS, 1969, REVISED 1983

BOISE CASCADE–INSULITE DIVISION
INTERNATIONAL FALLS, MINNESOTA

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

BOISE.DWG – 8/10/92 – MLB

Paper Machine No. 1 on the site of the former Insulite facility. The Paper Division now occupies the Insulite property.

The Insulite facility manufactured pressed-board products such as ceiling tile and insulation board. The raw materials involved with pressed-board manufacturing included oil, and mineral spirits, which were stored in aboveground storage tanks, wood, water, and chemical additives. Manufacturing pressed-board required grinding wood into a pulp and mixing it with water, mineral spirits, oil, and chemical additives. The mixture was rolled out onto a cylinder, pressed, and formed into long sheets. The sheets were kiln dried and cut into smaller sheets. Finally, the sheets were transported to the sidings plant for coating and stored in a warehouse.

Around 1974, Boise opened a sidings plant about .5 miles southeast of the Insulite facility. This sidings plant was used to coat pressed-board products manufactured at the Insulite facility with solvent-based paints. In 1980, the Insulite facility and the sidings plant were issued the same EPA ID number. In February of 1981, the sidings plant began using water-based paints. In 1985, Boise sold the sidings plant and property to the City of International Falls, Minnesota, which in 1987 sold the property and equipment to Orsi, Inc., a Canadian developer and the current owner of the plant. The sidings plant is now operated by Bildrite, Inc. (EPA ID No. MND 982 619 009) and manufactures pressed-board products for the home construction industry.

The Insulite facility currently has a paper mill on it operated by the Paper Division for manufacturing paper. Boise currently employs about 1,200 people at the Complex. The new paper mill covers about 65,000 square feet and has a large parking lot.

Solid wastes generated from past and present operations at the Insulite facility and the SWMUs where they are managed are discussed in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and an AOC, is shown on Figure 2. The facility's waste streams are summarized in Table 2.

The Insulite facility is currently used to manufacture paper. Wastes generated from the manufacturing process on the Insulite facility property include nonhazardous wastewater and waste process chemical residues (D001). Wastes generated from maintenance activities throughout the Complex and stored at the Insulite facility include paint waste (F003, F005), and

TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Waste Chemicals Storage Room	No	Active
2	Waste Oil Tank	No	Active
3	Paint Waste Satellite Accumulation Area	No	Active
4	Lift Station No. 8	No	Active
5	Former Waste Oil Drum Storage Area	No	Closed
6	Former Waste Crankcase Oil Drum Storage Area	No	Closed
7	Former Secondary Clarifier	No	Closed

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

CANADA

RIVER'S EDGE

TOP OF RIVER BANK

RIVER

RAINY

NEW SECONDARY CLARIFER (UNDER CONSTRUCTION)

SECONDARY CLARIFER

PAPER FACILITY

LIFT STATION NO.8 **SWMU 4**

4

OIL SPILL AREA **AOC 1**

FORMER WASTE OIL DRUM STORAGE AREA **SWMU 5**

5

BLEACH PLANT

NPDES OUTFALL NO.001

WASTE CHEMICALS STORAGE ROOM **SWMU 1**

PAINT WASTE SATELLITE ACCUMULATION AREA **SWMU 3**

3

PAPER MACHINE NO.1 BUILDING

BOUNDARY BETWEEN INSULITE FACILITY AND PAPER FACILITY

RBS BUILDING

GATE

2

WASTE OIL TANK **SWMU 2**

FORMER SECONDARY CLARIFER **SWMU 7**

PARKING LOT

FORMER WASTE CRANKCASE OIL DRUM STORAGE AREA **SWMU 6**

GUARDHOUSE

GATE

GUARDHOUSE

GATE

RESEARCH AND TRAINING CENTER

PAPER FACILITY

9th AVENUE

SECOND STREET

8th AVENUE

6th AVENUE

N

2 PHOTOGRAPH NUMBER, LOCATION AND DIRECTION

SOURCE: MODIFIED FROM A BOISE CASCADE SKETCH RECEIVED BY PRC IN JUNE 1992

NOT TO SCALE

BOISE1.DWG — 8/12/92 — MLB

BOISE CASCADE INSULITE DIVISION
INTERNATIONAL FALLS, MINNESOTA

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
MN	MND 980 700 884

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Boise Cascade -- Insulite Division	400 West Second St.

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
International Falls	MN	56649	Koochiching		

09 COORDINATES: LATITUDE 48° 36' 30.0" | LONGITUDE 093° 24' 20.0"

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

State Route 53 north through International Falls. Turn west on 2nd Street and the main entrance is on the north side of the street.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*
Boise Cascade Corporation	One Jefferson Square

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Boise	IL	83728	

07 OPERATOR *(if known and different from owner)*	08 STREET *(Business, mailing, residential)*
Boise Cascade Paper Division	400 Second Street

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
International Falls	MN	56649	(218) 285-5439

13 TYPE OF OWNERSHIP *(Check one)*

■ A. PRIVATE □ B. FEDERAL: _____ *(Agency name)* □ C. STATE □ D. COUNTY □ E. MUNICIPAL

□ F. OTHER _____ *(Specify)* □ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

■ A. RCRA 3010 DATE RECEIVED: 07/14/80 (MONTH DAY YEAR) □ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) □ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE 04/23/92
□ NO

BY *(Check all that apply)*

□ A. EPA ■ B. EPA CONTRACTOR □ C. STATE □ D. OTHER CONTRACTOR
□ E. LOCAL HEALTH OFFICIAL □ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*	03 YEARS OF OPERATION
■ A. ACTIVE □ B. INACTIVE □ C. UNKNOWN	1910s (BEGINNING YEAR) | Present (ENDING YEAR) □ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Oily waste, paint waste, chemical waste.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Air releases of chlorine and chlorine dioxide from current operations. Surface water releases of untreated water from current operaitons.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

□ A. HIGH *(Inspection required promptly)* □ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* □ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*	03 TELEPHONE NUMBER
Kevin Pierard	EPA	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Jeff Swano		PRC	(312) 856-8700	8/14/92 (MONTH DAY YEAR)

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Boise Cascade--Insulite Division
400 West Second Street
International Falls, Minnesota
MND 980 700 884

Date:	April 23, 1992
Facility Representative: Representative Telephone No.:	Allan Meadows, Environmental Engineer (218) 285-5686
Inspection Team:	Jeff Swano, PRC Environmental Management, Inc. (PRC) Mike Keefe, PRC
Photographer:	Jeff Swano, PRC
Weather Conditions:	Overcast, occasional drizzle and snow flurries, slight northerly breeze, about 30°F, with about 2 inches of snowcover on the ground.
Summary of Activities:	The visual site inspection (VSI) began at 8:50 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. The facility representative then discussed the facility's past and current operations, solid wastes generated, and release history. The facility representative provided the inspection team with copies of requested documents. The VSI tour began at 11:15 a.m. The tour began in the Paper facility where the inspection team observed primary and secondary clarifiers and the sludge they produce. The inspection team walked past Lift Station No. 8 (SWMU 4) and on to the Former Secondary Clarifier (SWMU 7). Between these two SWMUs, the facility representative pointed out approximate locations of the Oil Spill Area (AOC 1), and the Former Waste Oil Drum Storage Area (SWMU 5). The inspection team entered the RBS Building to observe the Waste Chemicals Storage Room (SWMU 1) and the Waste Oil Tank (SWMU 2). Upon exiting the RBS Building, the inspection team looked across a parking lot to observe the former location of the building that contained the Former Waste Crankcase Oil Drum Storage Area (SWMU 6). The inspection team then entered the Paper Machine No. 1 Building and observed the paper machine. At 1:10 p.m. the inspection team and facility representative, joined by two additional representatives, held an exit meeting. The VSI was completed and the inspection team departed the site around 1:30 p.m.

TABLE 2
SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Wastewater / NA	Paper manufacturing processes	4
Waste Process Chemicals / D001	Paper manufacturing processes	1
Paint Waste / F003 and F005	Maintenance activities	3
Waste Oil / NA	Maintenance activities	2
Waste Laboratory Chemicals / D001	Research laboratories	1
Waste Crankcase Oil / NA	Former maintenance activities	6
Waste Oil / NA	Former production facilities	5
Secondary Sludge / NA	Former production facilities	7

Note:

[a] Not applicable (NA) designates nonhazardous waste.

nonhazardous waste oil. Wastes generated off site and stored at the Insulite facility include waste laboratory chemicals (D001) from a laboratory located at the Paper facility. All scrap paper is recirculated into the paper manufacturing process. Annual generation rates presented below are based on 1990 and 1991 waste generation data.

Currently, wastewater is routinely generated from the paper manufacturing process at the Insulite facility. Wastewater is transported through pipes and Lift Station No. 8 (SWMU 4) to primary and secondary clarifiers located at the Paper facility. Sludge from the clarifiers is dewatered and stored at the Paper facility before being transported to the Moonlight Rock Landfill. This landfill, located about 3 miles east of the facility on contiguous Boise property, is active and owned and operated by Boise under the Paper Division's EPA ID number.

Wastewater is treated at the Boise wastewater treatment plant (WWTP), constructed in 1971 located at the Paper facility. The WWTP treats wastewater generated throughout the Complex. After the water is treated, it is discharged to the Rainy River via National Pollution Discharge Elimination System (NPDES) permitted outfall No. 001 (permit number MN0001643) located at the northwest corner of the Insulite facility. Prior to 1971, all wastewater was discharged directly into Rainy River.

Waste process chemicals (D001) are generated when raw material chemicals become contaminated or are unusable. These chemicals include defoaming agents and disspersants used in the paper manufacturing process. The chemicals are generated throughout the Complex and stored in the Waste Chemicals Storage Room (SWMU 1) in the 55-gallon drums in which they were received. Waste chemicals are analyzed by Chemical Waste Management, Inc. (CWM) prior to disposal. Some wastes are determined to have hazardous waste characteristics (D001), but most are nonhazardous. CWM transports the wastes off site to their storage facility in Saint Louis Park, Minnesota. CWM then transports the wastes to their Sauget, Illinois, facility for incineration. The Complex generates about 1,200 gallons of miscellaneous chemical wastes per year; it is unknown how much is generated specifically from the Insulite facility.

About 82 gallons of paint waste (F003 and F005) are generated annually by maintenance activities throughout the Complex. Paint wastes are stored in nine Paint Waste Satellite Accumulation Areas (SWMU 3) located throughout the Complex, but only one is located at the Insulite facility. These wastes are collected in 55-gallon drums. Safety-Kleen Corporation (Safety-Kleen) transports the wastes off site to their transfer and storage facility in Cloquet, Minnesota. The wastes are then transported within 10 days to their fuel blending plant in Dolton, Illinois. The fuel is ultimately burned at the Dundee cement kiln in Clarksville, Missouri. The

Complex also uses parts washers and carburetor cleaners that are also maintained by Safety-Kleen of Cloquet, Minnesota.

Other maintenance activities generating nonhazardous wastes include servicing facility vehicles and plant machinery. About 6,000 gallons of nonhazardous waste oils are generated annually from these activities throughout the Complex. Waste oils are collected in 55-gallon drums and pumped into a 7,000-gallon Waste Oil Tank (SWMU 2) for storage. Oil Services, Inc. transports the oil off site to their Eveleth, Minnesota, facility where it is either recycled or burned as fuel.

About 70 gallons of waste laboratory chemicals (D001) are generated annually at the Paper facility's laboratories and stored in the Waste Chemicals Storage Room (SWMU 1). These wastes are disposed of by CWM in the same manner as process chemical residues described above.

When the Insulite Division was operating, the facility routinely generated waste crankcase oil, waste oil, nonhazardous secondary sludge, and wastewater. Little information is available about past Insulite operations and waste generation and management because Boise did not keep operations records after dissolving the division.

The facility's service shop generated about three 55-gallon drums of waste crankcase oil per month from the late 1970s until the facility was closed in 1984. This waste was stored in drums on pallets at the Former Waste Crankcase Oil Drum Storage Area (SWMU 6) located inside the southeast corner of the former facility's service garage. Berg Oil (now doing business as Oil Services, Inc.) of Eveleth, Minnesota, transported the waste crankcase oil off site. The disposal method, however is unknown. It is unknown how much waste crankcase oil the facility generated before the late 1970s and how those wastes were disposed.

The facility's manufacturing equipment generated hundreds of 55-gallon drums of waste oil per month from the late 1970s, when the facility installed hydraulic presses, until the facility was closed in 1984. This waste was generated from the machinery leaking oil into pits located around the machinery. Water also ended up in the pits. The oil-water mixture was separated and the oil placed into 55-gallon drums and the water piped to the WWTP. The drummed oil was stored outside, on pallets, on the bare ground at the Former Waste Oil Drum Storage Area (SWMU 5). The oil was either given to Koochiching County, which sprayed it on roads for dust suppression, or sold to Arrowhead Refinery in Duluth for refining, or sold to Berg Oil. It is unknown how Berg Oil disposed of the oil.

Wastes generated directly by the pressed-board manufacturing process included secondary sludge and wastewater. Secondary sludge was generated from a Former Secondary Clarifier (SWMU 7) that settled out solids from the wastewater. The secondary sludge was piped directly to the Paper facility for storage, mixed with sludges produced there, and then disposed of at the Moonlight Rock Landfill. Wastewater was treated at the WWTP and discharged into the Rainy River at NPDES-permitted outfall No. 001. Prior to installing the WWTP in 1971, all wastewater was discharged directly to Rainy River.

The Insulite facility's presses generated air emissions, which caused odor and opacity problems, which residents complained about. In the late 1970s Boise constructed scrubbers for the facility's stacks, but they did not function well and were removed within two years of installation. Blowdown from the facility scrubbers went into the facility's sewers, which are connected to the WWTP.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

Between 1974 and 1991, MPCA documented numerous spills originating from the Boise Complex. The spills are identified in a spills and leak report, but neither the specific facility from which the spills originated nor the specific medium of the releases were identified in the report. Between 1974 and 1984, several spills of unknown compounds occurred each year (MPCA, 1992a).

On March 12, 1979, a steam coil broke on a 200,000-gallon oil storage tank (AOC 1). The oil eroded a granular area in the clay berm around the tank. About 70,000 gallons of oil was released. About 5,000 gallons entered the Rainy River but was never reclaimed; about 58,000 gallons were captured in a sump located east of the spill area. The remaining 7,000 gallons of oil are not accounted for. MPCA, the National Response Center, EPA, and the Coast Guard were immediately notified of the spill. No regulatory action was taken against the facility (PRC, 1992c).

On numerous occasions between June 1989 and August 1991, Boise exceeded their NPDES effluent limitations (State of Minnesota, 1991). Several of these exceedances were due to releases of untreated wastewater from Lift Station No. 8 (SWMU 4). The permit violations resulted in a Notice of Violation (NOV). By September 9, 1991, Boise had installed 24-hour composite

sampling equipment and continuous flow monitoring equipment at Lift Station No. 8 (SWMU 4) as directed by MPCA (State of Minnesota, 1991).

Chlorine and chlorine dioxide releases to the atmosphere or to facility sewers were commonplace during the first 18 months of operations at the bleach plant, which opened in December 1990. Because most releases had similar responses and impacts, a few examples are listed below.

On June 18, 1991, about 615 pounds of chlorine gas was released to the atmosphere from the bleach plant due to human error during a maintenance shut down. The chlorine release closed the international bridge, located 0.25 miles east of the bleach plant, for about 45 minutes. MPCA was notified of the release. Evacuation of the surrounding areas was not required, but bleach plant operations were temporarily shut down (Boise, 1991a).

On July 4, 1991, chlorine dioxide gas was released to the atmosphere from the bleach plant due to human error. This release was detected by U.S. Customs Officials, but the bridge was not closed. The MPCA was notified of the release. MPCA directed the facility to install a high priority, low flow alarm on the vent scrubber where the release originated (Boise, 1991b).

On August 5, 1991, a forktruck driver broke a drain line off the chlorine dioxide solution heater in the bleach plant and released about 1,560 gallons of solution into the mill sewer system. The facility's drains are connected to the WWTP. Local law enforcement officials, the Minnesota 24-hour Spills Division, and the National Response Center were notified of the spill. The bleach plant was shut down. The facility installed an additional guard post to prevent similar accidents in the future (Boise, 1991c).

According to information provided by the facility representative, other chlorine or chlorine dioxide releases occurred on the following dates: January 27, 1991, which lead to a NOV; September 29, 1991; September 30, 1991, which closed the international bridge; October 5, 1991, which hospitalized a supervisor; October 6, 1991; February 17, 1992; April 1, 1992; and April 3, 1992.

2.5 REGULATORY HISTORY

Boise submitted a Notification of Hazardous Waste Activity form to EPA on July 14, 1980 (Boise, 1980a). Boise submitted a RCRA Part A permit application for its Insulite Division on November 19, 1980 (Boise, 1980b). The permit application was for a 4,400-gallon container

storage area (S01) located at the sidings plant for wastes with F017 and D008 waste codes. No hazardous waste storage areas existed at the Insulite Facility.

The closure plan for the container storage area at the sidings plant was approved by EPA on July 31, 1984 (EPA, 1984). Bartlett and Associates of International Falls certified the closure activities on November 12, 1984 (Bartlett and Associates, 1984). MPCA received final authorization from EPA on February 11, 1985 to administer the State hazardous waste program in lieu of the federal program. On April 1, 1985, MPCA declared the container storage area to be officially closed (MPCA, 1985).

The Complex currently operates as a large-quantity generator of hazardous waste and stores wastes for less than 90 days. The operations currently active at the Insulite facility are included in this large-quantity generator status because the Complex files all reports using the Paper Division's EPA ID number (MND 076 505 262).

On numerous occasions between June 1989 and August 1991, Boise exceeded its NPDES permit effluent limitations at outfall No. 001 located at the Insulite facility. On October 9, 1990, MPCA issued Boise a Notice of Violation (NOV) for NPDES permit effluent limitation violations that occurred in 1990 (MPCA, 1991).

Recently, the facility has had RCRA compliance problems. The violations pertain to continual violations of the Paper facility's NPDES permit, some of which were due to failures at Lift Station No. 8 (SWMU 4), and a discrepancy in reporting the January 27, 1991, chlorine release to the atmosphere (MPCA, 1991; State of Minnesota, 1991). The violations resulted in a Stipulation Agreement on operating parameters between Boise and MPCA, and a civil penalty fine of $535,000 (State of Minnesota, 1991). As of March 20, 1992, MPCA acknowledged Boise's timely completion to date of all the requirements of the Stipulation Agreement (MPCA, 1992b).

During the Insulite manufacturing days, the facility did have operating air permits issued by MPCA for its pollution control equipment. The facility has a history of odor and opacity complaints from area residents. The Paper Division's operations at the Insulite facility have had numerous chlorine releases to the air as discussed in Section 2.4.

Wastewater treated at the WWTP is discharged to the Rainy River via NPDES-permitted (permit No. MN0001643) outfall No. 001.

The facility has never had any underground storage tanks.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Koochiching County is temperate continental. The average daily temperature is 36.4 degrees Fahrenheit (°F). The lowest average daily temperature is 1.9°F in January. The highest average daily temperature is 65.8 °F in July (Barr, 1983).

The total annual precipitation for the county is 25.65 inches (Barr, 1983). The mean annual lake evaporation for the area is about 22 inches. The 1-year, 24-hour maximum rainfall is about 2 inches (U.S. Department of Commerce, 1968).

2.6.2 Flood Plain and Surface Water

The Complex has been constructed atop the southern bank of the Rainy River. While this is a flood-prone area, the bank is about 25 feet high. According to a site representative, the facility has never been inundated because a seawall constructed along most of the bank is designed to withstand a flood. At the time of the inspection, the facility was constructing a secondary clarifier at the base of the seawall.

The nearest surface water body is the Rainy River located on the facility's northern border. The river is used for drinking water, recreation, and industrial discharge purposes (another paper mill exists in Fort Francis on the Canadian side of the river). The Insulite facility area is mostly flat and paved. All stormwater runoff sewers are connected to the WWTP. Water from the WWTP is discharged into the Rainy River via a NPDES-permitted outfall. The Rainy River flows west and north to the Lake of the Woods.

2.6.3 Geology and Soils

The geology and soils in the area of the facility have been investigated by Barr Engineering Company (Barr) and described in a report submitted to Boise to supplement its permit application to operate the Moonlight Rock Landfill (Barr, 1983). The information presented in this section is extracted from the Barr report.

Soils in the area of the facility are predominantly peat and clay. Underlying these soils is a highly impermeable clay layer with limited water bearing capacity. The clay originates from lacustrine deposits associated with ancient Lake Agassiz. The levels of the lake rose and fell over time which may account for sandy clay and clayey sand lenses and deposits found within the clay matrix of the region (Barr, 1983).

Glacial deposits of the Pleistocene era underlie the lacustrine deposits in the vicinity of the facility. While the area has been crossed by several glacial lobes, the glacial deposits were primarily formed during the Wisconsinan Glacial Epoch. Sand and gravel deposits found in the area are considered to be either outwash or ice contact deposits. The total thickness of the unconsolidated units varies between 20 and 90 feet (Barr, 1983).

Precambrian-age bedrock underlies the glacial deposits. The bedrock is composed of metavolcanic rock situated within a region of metasedimentary rock. Because the glacial drift in the area of the facility is thin, the land surface is primarily an expression of the bedrock topography (Barr, 1983).

2.6.4 Ground Water

Ground water in the vicinity of the facility is encountered primarily in the bedrock located between 20 and 90 feet below ground surface. Occasional sand and gravel lenses in the glacial till also provide ground water, but to a lesser extent. The highly impermeable clay acts as an aquitard isolating the lower bedrock aquifer from the sand and gravel lenses. Ground water is also encountered in sand and gravel deposits lying adjacent to the bedrock (Barr, 1983).

Private wells within the International Falls city limits are used for industrial purposes. These wells obtain water from the bedrock aquifer. In some areas the bedrock contains no water (PRC, 1992a; PRC, 1992b).

Because the land surface is primarily an expression of the bedrock topography, ground water flow is assumed to be to the north towards the river. The river is most likely a ground-water discharge area.

2.7 RECEPTORS

The Insulite facility occupies about 30 acres of the 90-acre Complex in a commercial and residential area in International Falls, Minnesota. International Falls has a population of about 6,000 people.

The facility is bordered on the north by the Rainy River and the international border between Canada and the United States; on the west by a residential area; on the south by commercial downtown International Falls; and on the east by the Paper facility. The nearest residential area is across the street to the south. Four schools are located less than 0.25 miles south of the facility.

The facility is fenced on three sides. The Rainy River is a natural barrier to entry on the facility's north side. Guards are posted at the several gates to the facility and the main guard station is manned 24-hours a day.

The city of International Falls obtains its drinking water from intakes in the Rainy River located 0.75 miles upstream from and to the east of the facility. The city distributes water to International Falls and to several communities east of the facility. About 20 percent of the population outside of the municipal water distribution boundary, or 100 people, use cisterns for drinking water purposes. Cisterns are refilled by a private water hauler with Rainy River water drawn from a metered spigot at the International Falls Water Department (PRC, 1992b). Other surface water bodies in the area of the facility include Rainy Lake located 2.75 miles east of the facility, which is the source of Rainy River. In addition, numerous wetlands make up the predominant topographical feature within a 2-mile radius of the site.

Ground water is used as a source of drinking water outside of the municipal water distribution boundary. About 80 percent of the population outside of the municipal water distribution boundary, or about 400 people, use private wells drawing from the bedrock aquifer. The nearest drinking water well is located about 2 miles south and upgradient of the facility. No ground-water wells are known to exist downgradient of the facility because of its proximity to the Rainy river and the possibility that ground water is discharged to the river. No wells exist at the facility.

No sensitive environments exist at the facility. The nearest sensitive environment is the large wetland located 1 mile north of the facility. Numerous large wetlands are located within a 2-mile radius of the facility. These wetlands are primarily upland bogs. Endangered species listed in the area of the site include the gray wolf (critical habitat), and the bald eagle (breeding habitat) (U.S. Fish and Wildlife Service, 1989).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the seven SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1	**Waste Chemicals Storage Room**
Unit Description:	This unit is located on the west side of the Rotating Biological Surface (RBS) building on the west side of the facility. The entire room is enclosed and measures 38 feet, 2 inches by 18.5 feet. The unit is used to store waste process chemical residues and waste laboratory chemicals from production and research activities for less than 90 days.
Date of Startup:	This unit began operation on March 12, 1991.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages waste process chemical residues (D001) and waste laboratory chemicals (D001). The wastes are picked up and incinerated or recycled off site.
Release Controls:	The unit is a completely enclosed room within a building. It has a 1-foot high concrete dike and is equipped with sprinklers. No floor drains are present in the room. Buckets of chemicals are stored covered on pallets on a concrete floor that is not sealed or painted.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	At the time of the inspection, one 55-gallon drum of solvents awaiting analysis, and several buckets of laboratory chemicals were stored in the room. Two empty 55-gallon drums were also stored in the room. The room was well kept and no stains on the floor or evidence of release were observed (see Photograph No. 1).

SWMU 2	**Waste Oil Tank**
Unit Description:	This 7,000-gallon fiberglass tank is located in the southwest corner of the RBS building about 15 feet south of the Waste Chemicals Storage Room (SWMU 1). The tank is located in a diked area measuring 15.5- by 19.25- by 5.6-feet high concrete dike. A floor drain is located 5 feet east of the secondary containment wall. This drain is connected to the WWTP which discharges to Rainy River.
Date of Startup:	This unit began operation in early 1991.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous waste oils. Theses wastes are transported off site and recycled or burned as fuel off site.
Release Controls:	The unit is surrounded by a concrete secondary containment wall that is 5.6 feet high. The concrete floor is not sealed.
History of Documented Releases:	The tank leaks but the dike surrounding the tank appears to be containing the leaking oil. Otherwise, no releases from this unit have been documented.
Observations:	At the time of the inspection, the tank was about half full. Oil was observed inside the secondary containment wall. PRC was informed that this occurred because the tank has a leak and that it will be replaced with a steel tank in the near future. PRC observed stains around the floor drain outside of the secondary containment wall, but the wall and floor did not appear to be leaking. The stains appeared to be due to poor housekeeping rather than a release from this unit. The floor drain is connected to the WWTP. No NPDES permit violations involving oily discharges from the WWTP have been documented. Water was on the floor around the outside of the unit because holes in the roof of the RBS building allowed precipitation to enter the building (see Photograph No. 2).

SWMU 3	**Paint Waste Satellite Accumulation Area**
Unit Description:	One unit is operated at the Insulite facility. This unit is composed of a closed 55-gallon drum equipped with a funnel and managed indoors on a concrete floor. PRC observed that the unit has no floor drains located nearby, has fire prevention equipment nearby, is clearly labelled, and has floor markings indicating the approximate position of each drum.
Date of Startup:	The unit at the Insulite facility began operation in December 1990.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste paint (F003 and F005) generated from maintenance activities. The unit is transported off site and blended as fuel for a cement kiln.
Release Controls:	The unit is stored indoors on concrete floors. No floor drains were present in the vicinity of the unit. Fire extinguishers are also located near this unit.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	The drum PRC observed during the inspection was not full. The areas around it was clean and no stains were observed on the floor (see Photograph No. 3).
SWMU 4	**Lift Station No. 8**
Unit Description:	This unit is located near the north central boundary of the facility, about 10 feet from the edge of the river bank. The unit is housed in a shed-like building. The unit pumps wastewater from the Insulite facility to the WWTP located at the Paper facility. The unit pumps about 6,000 gallons per minute (gpm) on average, with a maximum pumping rate of 17,500 gpm.
Date of Startup:	This unit began operation in 1971.

Date of Closure:	The unit is active.
Wastes Managed:	This unit handle wastewater from the facility's paper manufacturing process. In the past, it handled wastewater from the pressed-board manufacturing process.
Release Controls:	Boise installed 24-hour composite sampling equipment and continuous flow monitoring equipment in 1991 as directed by MPCA. The unit is housed in a shed-like building. No berms exist around the building and the seawall does not extend behind the building. Releases from the unit could flow down the river bank and into Rainy River.
History of Documented Releases:	On numerous occasions from June 1989 through August 1991 NPDES permit effluent limitations were exceeded. Several of these were due to releases of untreated wastewater from this unit.
Observations:	PRC noted no evidence of release during the inspection. The building and the unit appeared to be well maintained (see Photograph No. 4).
SWMU 5	**Former Waste Oil Drum Storage Area**
Unit Description:	This unit consisted of 55-gallon drums stored outdoors on pallets on the bare ground.
Date of Startup:	This unit is estimated to have begun operation in the late 1950s.
Date of Closure:	This unit was closed in 1984 when Insulite operations ceased.
Wastes Managed:	This unit managed waste oil that dripped from production machinery. The waste oil was either given to Koochiching County for dust suppression on county roads, or sold to Arrowhead Refinery in Duluth for refining, or sold to Berg Oil. It is not known how Berg disposed of the oil.

Release Controls:	This unit had no release controls.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The Paper Machine No. 1 Building presently occupies the site of this former unit.
SWMU 6	**Former Waste Crankcase Oil Drum Storage Area**
Unit Description:	This unit consisted of 55-gallon drums stored inside the southeast corner of a former service garage. The dimensions of this unit are unknown.
Date of Startup:	This unit is estimated to have begun operation in 1960.
Date of Closure:	This unit was closed in 1984.
Wastes Managed:	This unit managed nonhazardous waste crankcase oil generated from a service garage for facility vehicles. Berg Oil (now doing business as Oil Services, Inc.) of Eveleth, Minnesota, transported the oil off site. It is unknown how Berg disposed of the oil.
Release Controls:	This unit was maintained indoors. No other information is available describing how the unit was managed or what release controls existed.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	An asphalt parking lot now occupies the spot where this unit once operated.
SWMU 7	**Former Secondary Clarifier**
Unit Description:	This former unit is located outdoors, east of the RBS Building. This concrete structure measures approximately 62 feet in diameter

	and 11 feet high. This unit was used to settle out solids in wastewater from the Insulite pressed-board manufacturing process.
Date of Startup:	This unit began operation in 1976.
Date of Closure:	This unit has been inactive since it was closed in December 1984.
Wastes Managed:	This unit managed wastewater from the Insulite pressboard manufacturing process. Solids in the waste stream were settled out and the sludge was pumped directly to a dewatering processor at the Paper facility. The wastewater was treated at the WWTP and discharged via a NPDES-permitted outfall. The secondary sludge was mostly composed of biological solids. This sludge was mixed with primary and secondary sludges from the Paper facility and disposed of at the Moonlight Rock Landfill.
Release Controls:	The unit has no release controls. The unit is constructed on the ground about 25 feet from the top of the riverbank. No barriers were constructed between the unit and the riverbank.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	The unit was inactive at the time of the inspection. Snow cover during the inspection prohibited inspection of the soils surrounding the unit (see Photograph No. 5).

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. This AOC is discussed below; its location is shown on Figure 2.

AOC 1 **Oil Spill Area**

In 1979, about 70,000 gallons of oil were released from a 200,000-gallon oil storage tank. About 58,000 gallons of spilled oil were reclaimed, about 5,000 gallons of oil were released to the Rainy River, and the remaining 7,000 gallons were unaccounted for. No regulatory action was taken against the facility. It is possible a substantial release to on-site soils occurred from the spill.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified seven SWMUs and one AOC at the Insulite facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOC at the facility and the recommended further actions.

SWMU 1 **Waste Chemicals Storage Room**

Conclusions: This unit does not pose a significant threat of release to the environment because it is completely enclosed, bermed, and equipped with appropriate emergency equipment. The potential for release to environmental media is summarized below.

Ground Water, Surface Water, Air, and On-Site Soils: The potential for a release is low. The construction of the room limits the possibility of a release. Current waste handling practices reduce the potential of a release because wastes are stored closed and for less than 90 days

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 2 **Waste Oil Tank**

Conclusions: The tank is leaking, but the dike around it has adequate volume and is in good condition. If the dike should fail, wastes could migrate to a nearby floor drain connected to the WWTP. The potential for release to environmental media is summarized below.

Ground Water: The potential for a release is low. The dike surrounding the tank and the floor is in good condition. The facility is located in an area of impermeable clay between 20 and 90 feet thick. Ground water is encountered in the bedrock beneath the clay.

Surface Water: The potential for release is low. A release from this unit would flow to a floor drain located near the unit. The floor drain is connected to the WWTP. No NPDES permit violations involving oily discharges from the WWTP have been documented. No overland route exists from this unit to a surface water body.

Air: The potential for release is low. The waste oil managed by this unit is not volatile.

On-Site Soils: The potential for release is low. The unit is indoors, on a concrete floor, and no cracks were observed.

Recommendations: PRC recommends that the facility implement its plan to replace the leaking tank.

SWMU 3 **Paint Waste Satellite Accumulation Area**

Conclusions: This unit is a 55-gallon drum maintained indoors on a concrete floor. The potential for release to environmental media is summarized below.

Ground Water, Surface Water, Air, and On-Site Soils: The potential for a release is low. The unit is stored closed, indoors, and on a concrete floor with no visible cracks.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 4 **Lift Station No. 8**

Conclusions: This unit has a history of releases which have been addressed through the installation of composite-sampling and flow-monitoring equipment. The unit is built at the top of a riverbank. The potential for release to environmental media is summarized below.

Ground Water: The potential for a release is low. Any release from this unit would immediately flow down the riverbank into the Rainy River, or possibly to facility sewers, which are connected to the WWTP.

Surface Water: The potential for a release is moderate. Any release from this unit would immediately flow down the riverbank into the Rainy River. Composite-sampling and flow-monitoring equipment has been installed to limit the potential for future releases. Such a release would violate the facility's NPDES permit requirements.

Air: The potential for a release is low. The wastes managed by this unit are not volatile.

On-Site Soils: The potential for a release is low. Any release from this unit would immediately flow down the riverbank into the Rainy River. The ground surrounding the unit has been asphalted.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 5 **Former Waste Oil Drum Storage Area**

Conclusions: This unit was located outdoors on the bare ground. The Paper Machine No. 1 Building currently exists on the site of this former unit. The past potential for release to environmental media is summarized below.

Ground Water: The potential for a release was low to moderate. If a release to ground water occurred in the past, its proximity to Rainy River, which is probably a ground water discharge area, would limit its time in the ground water. Ultimately the release would be to the river.

Surface Water: The potential for a release was low. A release from this unit could not have flowed directly overland to the Rainy River because of barriers constructed along the top of the riverbank.

Air: The potential for a release was low. The waste oil was not volatile.

On-Site Soils: The potential for a release was moderate. Any release from this unit would immediately have affected soils due to the lack of any barrier between the unit and the soil.

Recommendations: PRC recommends no further action for this SWMU at this time. The Paper Machine No. 1 Building is constructed at the location of this former

unit. Any on-site soils affected by a past release have likely been moved or mixed with other soils during construction.

SWMU 6 **Former Waste Crankcase Oil Drum Storage Area**

Conclusions: This unit was maintained inside of a building that no longer exists. The past potential for release to environmental media is summarized below.

Ground Water, Surface Water, Air, and On-Site Soils: The potential for a release was low. This unit was maintained indoors which minimized the potential for a release.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 7 **Former Secondary Clarifier**

Conclusions: This unit is closed and no longer manages waste. When the unit was operating it handled nonhazardous wastes. The past potential for release to environmental media is summarized below.

Ground Water, Surface Water, Air, and On-Site Soils: The potential for a release was low. Nonhazardous wastewater was managed at this unit.

Recommendations: PRC recommends no further action for this SWMU at this time.

AOC 1 **Oil Spill Area**

Conclusions: This area is currently under an asphalt roadway. A release to the surface water did occur. The potential for a release to on-site soils is high because of the large volume of oil spilled and the amount of oil not reclaimed.

Recommendations: PRC recommends sampling on-site soils in the vicinity of the AOC.

TABLE 3

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Waste Chemicals Storage Room	March 12, 1991 to present	None	No further action at this time
2. Waste Oil Tank	1991 to present	Tank leaks. Stains observed near floor drain	Replace tank
3. Paint Waste Satellite Accumulation Area	December 1990 to present	None	No further action at this time
4. Lift Station No. 8	1971 to present	Overflows from 1989 to 1991	No further action at this time
5. Former Waste Oil Drum Storage Area	Late 1950s to 1984	None	No further action at this time
6. Former Waste Crankcase Oil Drum Storage Area	1960 to 1984	None	No further action at this time
7. Former Secondary Clarifier	1976 to 1984	None	No further action at this time

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1. Oil Spill Area	March 1979	70,000 gallons of oil spilled; 58,000 gallons reclaimed; 5,000 gallons released to river; 7,000 gallons not accounted for	Sample soils in the area

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Photograph No. 1 Location: Chemical Waste Storage Room
Orientation: Southwest Date: 04/23/92
Description: Chemical wastes stored on pallets in the chemical waste storage room. Drum awaiting analysis to determine proper disposal is in the foreground.

Photograph No. 2 Location: Waste Oil Tank
Orientation: South Date: 04/23/92
Description: The waste oil tank. Water on the floor is due to precipitation entering the building through a hole in the roof. Materials in front of the containment wall are for containing oil spills.

Photograph No. 3 Location: Paint Waste Satellite Accumulation Area
Orientation: South Date: 04/23/92
Description: A typical paint waste satellite accumulation area. Note the sign above it and the marking on the floor below it.

Photograph No. 4 Location: Lift Station No. 8
Orientation: West Date: 04/23/92
Description: The smaller blue building to the right is the lift station.

Photograph No. 5 Location: Former Secondary Clarifier
Orientation: West Date: 04/23/92
Description: The former secondary clarifier is in the foreground. The RBS Building is in the background.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

(88)

National Asbestos Abatement has AC's blanket order for asbestos removal, Flint, MI.
MIS is another asbestos removal firm used in Saginaw, MI

West of Engineering is the Dort Highway Complex which assembles, constructs spark plugs + other parts.
East of it => The Averill St. Complex manufacturing automotive component parts.
South ~~West~~ JS 3/26/92 is the AC WWTP.
1245 file reviewing + photocopying
1320 Depart.

Susan 3/26/92

Thursday April 23, 1992 (89)

Arrival Time: 0830
Departure Time: 1830

Weather: Overcast, Slight drizzle 30°F slight breeze. Sleeting

Interview START Time: 0850
Interview End Time: 1115

Persons Present	Affiliation
Jeff Swano	PRC
Mike Keefe	PRC
Al Meadows	Boise Cascade

Susan 4/23/92

Arrived at the site & checked in. Al Meadows picked us up. He's been here since 1976. 0845 we are in conference room and Mike is describing the program.

Interview begins 0850

Paper & Insulite filed Part As to cover their butts because of ambiguities in the law. They also filed Part Bs for both Paper & Insulite, but they retracted.

Paper mill began in 1910s. Generate "rejects". Insulite was built to work with rejects making insulation board, ceiling

Swans 4/23/92

tile & other press board ~1930s

As the market picked up, Insulite got their own sources (no more "rejects")

In the 1970s they began pressing by hydraulic machinery. Products went to Sidings plant for coating solvent-based, then went to water-based in Feb.

Closed the facil. at end of 1984

Wood is ground up into a pulp. Additives added. On a cylinder into long sheets. Kiln dried & cut into smaller sheets for end use.

Wood wastes & residues were

Swans 4/23/92

generated & taken to the Moonlight Rock landfill. 3 miles South East of here on Boise Cascade contiguous property. Began ca. 1940s.

In 1971 1st 1° clarifier installed So now 1° sludge is generated & going to Moonlight Rock

2° WWT system ~ 1977 → 1978 & failed. Aborted. Put in a new system in 1979 got an oxygen activated Sludge Treatment system This is a 2° sludge.

All water discharges into Rainy River and are permitted.

No records from Insulite remain

Swans 4/23/92

Solvents are generated at maintenance shops

The 2° clarifier had 1.3 mill. gallon capacity & to handle 4 mill. gallons of flow per day.

Had some scrubbers for Insulite. Installed ~ late '70s. Didn't function well but blowdown went into sewers.

Presses created 1° air problems w/ odors & opacity.

Al Turenne now is manager at Built-Rite. They operate at the old Sidings area. He was production Mgr. Sold Sidings to Int'l Falls; corp sold it to Orsi of Canada

Swans 4/23/92

& they are now owners of the place. They (Bose) did an internal Phase I to verify the property is clean. There are PCB transformers there now.

New Insulite took paints over w/ them. Wayne Golly at MPCA can tell us about the info.

Insulite used 30 acres.

All covers ~ 90 acres

Contiguous property covers about 3 miles east & south of the facility.

~1200 employees currently.

~~~700~~ JS 4/23/92 ~300 at Insulite.

Swart 4/23/92

Used crankcase oil was located at the Service shop.

Oil leaked from machine into pits. But this was drummed after being decanted. Water went to the WWT system. Drummed oil went to: County for spraying roads; Arrowhead refinery near duluth for reprocessing; Also to Oil Services Inc. Eveleth, MN. (Still used)

Generated late 1970s ~ 100s of drums/month

Crankcase = ~3 drums/month

Swart 4/23/92
~~~

(96)

Sold Insulite machinery + demolished the building. Rebuilt in 1988 a new building which has the #1 Paper machine. The largest uncoated sheet paper mill in the world. Chips are the raw material + are blown into the facility + into a cyclone. Digesters are huge pressure cookers. Ushers liquor + chips are mixed. Removes lignon. After cooking the pulp is blown out + goes to brown stock washers to screen out wood fiber. (it is a black liquor also screened out).

Susan 4/23/92

(97)

Kraft recovery recovers the black liquor into a concentrate + burn it. Generates steam. The ash (≡ smelt) is residual inorganic chemicals. Goes to smelt dissolving tank in weak wash. Now is green liquor. Settle the green + add it to calcium oxide. Now it is white liquor. Back into the system.

Pulp, meanwhile, goes to bleach plant. Chlorine + chlorine dioxide + caustic extraction + later add more chlorine dioxide.

Susan 4/23/92.

(98)

Pulp goes to new building & old building.

Wastewaters come in from all over the mill: Pulp, bleaching, stock preperation.

Water goes to lift stations. Pump to head box at 1° clarifier. 1° clarification, oxygenated sludge, & 2° clarification

Problems with sludge that is too wet going to the landfill.

NPDES # MN0000623 for outfall The only one they have.

Wells are on site for monitoring

Production water comes Rainy River as does the City

Susan 4/23/92

(99)

In the City of International Falls gets water 1.5 miles upstream of the facility.

Boise gets drinking water from City.

1957 → 1974 Insulite generated solvent based paint wastes hauled to a Gravel pit 5 miles west of town.

Spent $1.5 million to clean it up as the only responsible party. 1982 to 1985 cleaning up. Periodic reporting.

Chlorine gas releases have occurred.

Black liquor spills cause foaming & high BOD's

Susan 4/23/92

There have been lift station spills to Rainy River.

Removed some tanks in 1985 w/ no sampling around them. Contained fuel, turpentine,

Facility is fenced except for river. 24-hour guard.

Outdoor oil storage. Drums on pallets on the ground. Now is asphalt.

Now we're going to discuss haz waste from the whole plant as it is today.

Caustic Grits ⇒ impurities from the slaking process. (Weak wash combined w/ quick lime). Sewered & to WWT system

[signature] 4/23/92

Paint waste from maintenance. Managed by Safety-Kleen SAAs throughout the mill. Cloquet, MN. S-K goes to each, all 9 of them.

Caustic reburn lime. Sewered.

Chemical laboratory ⇒ Some chemicals all wastes are sewered.

Stormwater goes to WWTP.

Caustic dregs ⇒ (trying to delist) Green liquor clarifier comes from. Dewatered in a filter, scrape filter & residual to LF.

PCB transformers ⇒ oil, carcases, & debris. Originally over 40. Program to get rid of. 16 left & all gone by YE 1995.

[signature] 4/23/92

(102)

Mineral spirits ⇒ Parts washers
maintained by Safety Kleen
~~10 12~~ JS 4/23/92 total is 17

Carburator cleaner ⇒ maintained
by Safety-Kleen
Lots of Chemicals used here ⇒
Occassionally they just find
drums. Chem Waste Management Services
based in Saint Louis Park, MN.
Ultimately incinerated.
In the old RBS building they
store wastes + labeled.
Analyzed then, depending on
how analysis, They dispose.
Used oils ⇒ go to RBS A
diked storage tank.
Oils are pumped into it.

Swan 4/23/92

(103)

Oil Services comes in
6 or 7,000 fiberglass tank
with a leak
New Stainless Steel tank
on order.

RBS building aka hazardous
chemical storage building.

Interview ends at 1115
And we prepare to go on
facility walk-through.
1500 ~~Arrive at~~ JS 4/23/92

Swan 4/23/92

Photo Log J. Suarez 4/23/92

Photographer: ~~M. Keefe~~ JS / Kodak ASA 400

Continued from Previous PA/USE Roll.

#	Time	Dir.	Subject
7	1140	NNE	Sludge accum area from waste water treatment
9	1150	W	# 8 lift station
10	1155	W	old Insulate clarifier.
11	1200	S	Waste oil tank in RBS Bldg
12	1210	SW	Chem waste storage.
13	1240	ESE	Haz waste "debris"
14	1245	N	Paint & solvent SAA
15	1510	W	Former paint storage area.
16	1650	E	Stacks of drums from Boise.
17	1655	NA	Panorama of 72
18	↓	↓	drums
19	↓	↓	↓ ↓
20	↓	West	Perspective view
21	1705	West	Chip sludge w/ sand gravel.
↓	↓	↓	hydrosieve

Suarez 4/23/92

Transformers in a machine control center

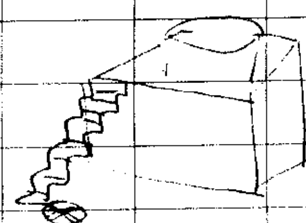
Also debris is collected

50 tons/day of sludge keeps going out. Concrete walls around 3 sides.

Waste oil Tank ⇒ floor drain

5 feet East of berm area

Appears to be some oil staining under stairs



Suarez 4/23/92

Chemical waste storage building
inside the RBS bldg
walled, diked 1 foot high.
various drums on Pallets
2 non-hazardous drums
+ one awaiting analysis.
Red'd the room. With
sprinklers
PCB room = 1235.
Very clean. Doorway is diked.
10 drums marked hazardous
waste. Epoxy painted
floor. → empty drums but
are ready for stuff to
go in. ↳ aka debris.
The drum w/ debris is in
the SE corner of room.
The doors are well marked + locked.
1310 meet Sergio Torza + Mike
conducts closing meeting.
Not after 1984/90 CEI they
are a LQG; This was told to
us by Al.
During press pit removal, they
encountered PCB contamination
Asbestos was encountered + disposed
at Moonlight Landfill.
1500 Arrive at BildRite
101 E. Hwy 11, International
Falls
1510 Meet Al Threne
Mike tells him why were

Swart 4/23/92

Swart 4/23/92

Minnesota Pollution Control Agency

October 24, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Allan Meadows
Bosie Cascade
Insulite Division
400 West 2nd Street
International Falls, Minnesota 56649

RE: Corrective Action Requirements for Boise Cascade Insulite Division MND 980 700 884

Dear Mr. Meadows :

MINNESOTA POLLUTION CONTROL AGENCY AUTHORIZATION:

The Regulatory Compliance Section (RCS) of the Minnesota Pollution Control Agency's Hazardous Waste Division is authorized by the United States Environmental Protection Agency (EPA) to administer permitting, corrective action, and closure of Resource Conservation and Recovery Act (RCRA) treatment, storage, or disposal facilities.

The EPA maintains a list (ranked by the likelihood of exposure to potential releases) of all companies that operated as RCRA facilities. In accordance with agreement between the EPA and MPCA, the MPCA has been, and continues to assess each company on the list in order of the priority assigned by the EPA. The MPCA apologizes for this late contact concerning Boise Cascade Insulite Division (Boise); however, priority and budget issues have not allowed the MPCA to investigate former RCRA facilities in a timely fashion.

REGULATORY HISTORY:

RCS records indicate that, in November of 1980, Boise submitted a RCRA Part A permit application to the EPA. By submitting the Part A RCRA permit application Boise was allowed to operate as, and was considered, a RCRA storage facility operating under interim status.

In April of 1985, the MPCA approved closure of the Boise facility with respect to the permitted container storage area. However, under RCRA, as amended by the 1984 Hazardous and Solid Waste Amendments (Section 3008 (h)), the property is subject to corrective action requirements.

CORRECTIVE ACTION PROCESS:

The RCRA corrective action process is designed to assess the likelihood of releases having occurred, and to investigate, and if necessary, cleanup soil and or groundwater contamination resulting from such releases. The corrective action process follows a phased approach with termination of the process occurring at any appropriate step along the way. The four (4) steps in the corrective action process are listed below.

1) Identify all areas at a facility where wastes have been managed and determine if additional investigation is warranted (RCRA Facility Assessment). This report is written by the regulating authority.

2) Investigate all areas where releases may have occurred (RCRA Facility Investigation). The owner or operator of the facility is responsible for this and the following two (2) reports listed in steps 3 and 4 below.

3) Propose remedies to cleanup any soil or groundwater contamination (Corrective Measures Study).

4) Implement the selected remedy to cleanup any soil or groundwater contamination (Corrective Measures Implementation).

The RCS understands that PRC Environmental Management, under contract from the EPA, conducted a Preliminary Site Assessment/Visual Site Inspection of the property in April of 1992. The Preliminary Site Assessment/Visual Site Inspection (enclosed) fulfills the requirements of a RCRA facility assessment (step 1 of the corrective action process outlined above).

COMPLETING THE CORRECTIVE ACTION PROCESS:

Information collected during the Preliminary Site Assessment/Visual Site Inspection indicates that additional information or investigation will be necessary in the vicinity of the 1979 oil spill area designated as Area of Concern 1 in the PRC report. Soil sampling results will be necessary to determine if the area has been adequately addressed.

To facilitate further investigation and, if necessary cleanup, the RCS conducts corrective action work under a corrective action agreement (Agreement). Enclosed is a draft Agreement pertaining to the Boise property for your review. Attached to the draft Agreement is the Preliminary Site Assessment/Visual Site Inspection of the property.

If you have additional information or sampling results related to the area outlined above please forward the information to me. If no additional information or data is available it may be possible for Boise to complete an initial investigation (with oversight from the MPCA) to see if further investigation of the area is necessary prior to addressing the Corrective Action Agreement. If there is no evidence of a threat to human health or the environment, the agreement would not be necessary and the site could be closed with respect to RCRA corrective action.

Please review the enclosed information and call me at 612/297-8477, with your questions, comments, or concerns. Thank you.

Sincerely,

Jon M. Pollock
Permit and Review Unit
Regulatory Compliance Section
Hazardous Waste Division

JMP:mln

Enclosures

cc: Heidi Kroening, Minnesota Pollution Control Agency, Duluth Regional Office
U.S. Environmental Protection Agency, Region V

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

November 5, 1992

Mr. Allan Meadows
Boise Cascade Corporation
400 West 2nd Street
International Falls, MN 56649

Re: Visual Site Inspection
Boise Cascade Corporation
Insulite Division
International Falls, Minnesota
MND 980 700 884

Dear Mr. Meadows:

As indicated in the letter of introduction sent to you on April 8, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 8, 1992

Mr. Allan Meadows
Boise Cascade Corporation
400 West 2nd Street
International Falls, MN 56649

Re: Visual Site Inspection
Boise Cascade Corporation
Insulite Division
International Falls, MN
MND 980 700 884

Dear Mr. Meadows:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for April 22, 1992 at 8:30 a.m. The inspection team will consist of Michael Keefe and Lorraine Morris of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Minnesota Pollution Control Agency (MPCA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Bruce Brott, MPCA

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows:

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU

Project I.D.	Boise Cascade, Insulite Division, MNT280010695 International Falls
H.W. Activity:	SQG (possibly G and TSDF)
Priority:	B
MPCA Staff:	Darryl Weakley
Date of Inspection:	May 19, 1982

Statement of Problem: During our inspection, solvents (listed and unlisted) were observed that were not disclosed on their management plan. On June 3, 1982 the Disclosures Unit sent a letter addressing this concern with a thirty day response. In addition, 3,000-4,000 accumulated drums of waste are presently stored on site awaiting possible codisposal.

Enforcement Actions: Enforcement action will be determined when the company submits their management plan listing the additional solvents. A follow-up inspection may be conducted, if needed. Boise Cascade maintains that all accumulated waste stored in containers are nonhazardous. They initiated the use of nonhazardous (no solvents or metals) base paints on or around December 1, 1980. However, MPCA records indicate the last disposal of hazardous base paint sludges occurred on or around October 1, 1980. A letter will be drafted requesting Boise to document disposal of their hazardous paint sludges for the months of October through November 1980.

On November 6, 1982 the MPCA sent a letter, certified mail, to Boise requesting them to verify the disposal of hazardous paint sludges from September 22, 1980 through December 1, 1980. Boise's response was received on November 22, 1982. Their response indicated that they, in fact, had hazardous paint sludges (they estimated approximately 17 55-gallon containers) stored at the sidings plant.

Since the Insulite Division has filed a Part A permit application with the U.S. EPA, there appears to be no problems at this time. The MPCA will conduct an inspection at the Insulite Division sidings plant to verify compliance with RCRA as soon as possible. A letter will be drafted explaining how Boise qualifies under RCRA.

Letter was sent February 7, 1983 giving 30 day response period.

Letter was received February 24, 1983 from Boise Cascade, Insulite Division. Boise Cascade indicated the drums containing hazardous waste will be isolated when the MPCA approves the disposal of the nonhazardous latex paint waste. The hazardous drums will be manifested to a permitted disposal facility and a notice of closure would be issued.

On March 31, 1983 Boise Cascade met with MPCA staff. It was decided by MPCA staff the current storage of the drums could continue until Moonlight Rock is permitted.

The permit was issued on November 21, 1983. A letter will be drafted requesting Boise Cascade's schedule on segregating and disposing of drummed paint waste.